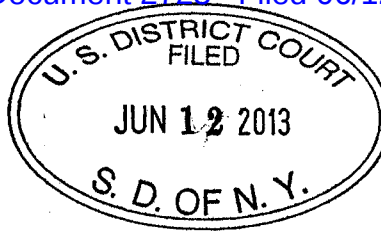


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US DISTRICT COURT SDNY

**In re Terrorist Attacks of September 11, 2001, 03 MDL 1570 (GBD) (FM)**

This document relates to:

*Ashton, et al v. Al Qaeda Islamic, et al*, 02-cv-6977

*Burnett v. Arab Bank, PLC*, 03-cv-9849

*Federal Insurance Co. v. Al Qaida*, 03-cv-6978

*O'Neill v. Al Baraka Investment & Devel. Corp.*, 04-cv-01923

*Continental Casualty Co. v. Al Qaeda*, 04-cv-05970

*Cantor Fitzgerald & Co. v. Akida Bank Private Limited*, 04-cv-07065

*Euro Brokers Inc. v. Al Baraka Investment & Devel. Corp.*, 04-cv-07279

APR 10 2013

Dear Judge Maas:

Pursuant to this Court's January 20, 2011 order regarding discovery motions and Federal Rule of Civil Procedure 37 the Moving Defendants<sup>1</sup> submit this Letter Motion To Compel Production of Documents Improperly Designated as Privileged in the above-captioned case (the "Litigation").

Plaintiffs in the Litigation submitted a privilege log ("Privilege Log") on February 1, 2013 that is materially deficient for two reasons. First, it appears that all of the documents on the log are plainly not privileged and, in addition, many should not have been part of this litigation. Second, the log itself is deficient in that it lacks adequate details about the documents—indeed, we cannot even assess to which defendant a document relates. Regrettably, Plaintiffs' have refused to engage with Moving Defendants on these issues. Thus, Moving Defendants respectfully request that the Court order Plaintiffs to produce each document on their log. In the alternative, the Court should order Plaintiffs to amend their log to comply with Local Rule 26.2 and this Court's order concerning privilege logs.

### INTRODUCTION

Plaintiffs and Moving Defendants conducted extensive negotiations regarding the content of the privilege logs. Throughout these negotiations, Plaintiffs pushed for the exchange of detailed privileged logs. Plaintiffs explained that such logs were necessary to ensure that the logs would contain enough information to "distill which privilege claims will be disputed, help the parties engage in meaningful meet and confers to distill what issues need to be brought to the

<sup>1</sup> The Privilege Log relates to requests for production submitted by Defendants Al Haramain Islamic Foundation, Inc. (USA), Dubai Islamic Bank, International Islamic Relief Organization, Muslim World League, Sana-Bell, Inc., Sanabel Al Kheer, World Assembly of Muslim Youth / World Assembly of Muslim Youth International, Wael Jelaidan, and Perouz Sedaghaty.

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courts [*sic*] attention, and help the court [*sic*] to work through the disputes that are brought to the Court for resolution.” See PEC Letter to Judge Maas dated October 19, 2012, attached hereto as Ex. 1. On November 19, 2012, the Court ordered the parties to include the following information in their privilege logs: the type of document; the general subject matter of the document; the date of the document; the authors of the document, the addressees of the document and any other recipients, and, where not apparent, the relationship of the authors, addressees, and recipients to one another; and if the document is an electronic document, its file size. See Ex. 2.

On February 1, 2013, the parties exchanged their privilege logs. Plaintiffs’ Privilege Log (attached as Ex. 3) suffers from two key defects. First, Plaintiffs’ Privilege Log includes two general categories of documents that, on their face, are not privileged: (i) documents associated with Plaintiffs’ FOIA requests to various government agencies and the agencies’ responses; and (ii) documents that were produced in the case captioned *Linde, et al. v. Arab Bank, PLC*, Case No. 04-CV-2799(NG) (VVP) (E.D.N.Y.). Second, the Privilege Log is not sufficiently detailed because it did not (i) delineate which purportedly privileged document pertained to which Moving Defendant’s document requests, nor (ii) contain other information necessary to determine the subject matter of the listed documents.

On February 12, 2013, Moving Defendants sent Plaintiffs a letter detailing these deficiencies and asking Plaintiffs to produce the non-privileged documents and, to the extent Plaintiffs continued to claim privilege for any remaining documents, to amend their log to describe more clearly the claimed privilege. Plaintiffs have neither responded to this letter nor produced the documents. As set forth more fully below, Plaintiffs’ failure to produce non-privileged documents and to amend their log violate the Federal Rules and this Court’s orders. Therefore, the Court should order Plaintiffs to produce each document on their log and further, to amend their Privilege Log to comply with Local Rule 26.2 and this Court’s previous orders.

**ARGUMENT**

**I. Improperly Withheld Documents.**

**A. FOIA Requests and Responses.**

Eight hundred fifty entries in Plaintiffs’ Privilege Log consist almost entirely of correspondence relating to FOIA requests Plaintiffs served on various agencies of the U.S. government (ranging from the Bureau of Engraving and Printing to the Jimmy Carter Presidential Library), with a small number of other items relating to similar correspondence with international judicial tribunals (collectively, “FOIA Documents”). The FOIA Documents fall generally into three categories: (i) correspondence from Plaintiffs’ counsel to government officials; (ii) correspondence from government officials to Plaintiffs’ counsel; and (iii) attachments to government responses that are apparently government documents produced in response to FOIA requests. The Privilege Log erroneously asserts a blanket “Attorney Work Product” protection as to each of these entries. None of these three categories are privileged.

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First, with regard to correspondence from Plaintiffs' counsel to government officials, "it is well settled that the 'voluntary disclosure of confidential material to a third party waives any applicable attorney-client privilege.'" *Crawford v. Franklin Credit Mgmt. Corp.*, 261 F.R.D. 34, 43 (S.D.N.Y. 2009) (Maas, M.J.) (quoting *Schanfield v. Sojitz Corp. of Am.*, No. 07-9716, 2009 WL 577659, at \*3 (S.D.N.Y. Mar. 6, 2009)). In the Second Circuit and elsewhere, voluntary disclosure of information to the government waives the privilege, including the work-product doctrine. See, e.g., *In re Initial Public Offering Sec. Litig.*, 249 F.R.D. 457, 466-67 (S.D.N.Y. 2008); *Bank of Am., N.A. v. Terra Nova Ins. Co.*, 212 F.R.D. 166, 170-71 (S.D.N.Y. 2002). Plaintiffs voluntarily disclosed to the recipient agencies information in these FOIA requests. Such information is no more work product than any document request served under Federal Rule of Civil Procedure 34 or any subpoena served under Federal of Civil Procedure Rule 45. Because FOIA requests are functionally analogous to requests like Rule 45 third-party subpoenas—which are not work product protected—Plaintiffs cannot shield their discovery of governmental records through the guise of a FOIA request.

Second, correspondence prepared by government officials is not attorney work product. The government officials responsible for preparing these responses are in no way involved in the MDL-1570 litigation and did not prepare the responses or attachments in anticipation of litigation. Indeed, this correspondence was prepared by third parties—not agents of Plaintiffs.

Third, underlying primary-source documents attached to the government's responses to Plaintiffs' FOIA requests are not work product. Accordingly, they do not pose any conceivable privilege concerns.

In fact, "[i]t is generally accepted that a response to a request under the FOIA is a public disclosure." *U.S. ex rel. Grynberg v. Praxair, Inc.*, 389 F.3d 1038, 1050-1051 (10th Cir. 2004); see also *United States ex rel. Schumer v. Hughes Aircraft Co.*, 63 F.3d 1512, 1519-20 (9th Cir. 1995), *vacated on other grounds*, 520 U.S. 939 (1997); *United States ex rel. Reagan v. East Texas Medical Ctr. Reg'l Healthcare Sys.*, 274 F.Supp.2d 824, 845 n. 15 (S.D. Tex. 2003) (and cases cited therein). Such information can be obtained by any other person through making its own FOIA request. "When a document must be disclosed under FOIA, it must be disclosed to the general public and the identity of the requester is irrelevant to whether disclosure is required." *Stonehill v. IRS*, 558 F.3d 534, 538-39 (D.C. Cir. 2009).

Plaintiffs should have produced the FOIA requests and responses in discovery months ago, and no basis exists for including these documents on the Privilege Log. Moving Defendants seek an order compelling Plaintiffs to produce these responsive documents to defense counsel.

## **B. The Arab Bank Confidential Documents.**

Plaintiffs appear to have used confidential documents in violation of court orders in another litigation and now attempt to use the Privilege Log unfairly to shield those documents from production. Plaintiffs have withheld documents pursuant to approximately 167 privilege log entries, noting the documents are subject to a "Protective Order dated August 1, 2005, in *Linde, et al. v. Arab Bank, PLC*, Case No. 04-CV-2799(NG)(VVP) and related cases" pending in the U.S. District Court for the Eastern District of New York. However, the protective order in

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that case specifically provided that documents produced and marked as confidential in that litigation can only be used in the consolidated *Arab Bank* litigation, and in any cases consolidated by that court:

3. Use of Confidential Information: **Confidential Information and Highly Confidential Information shall not be used by any person, other than the Designating Party, for any purpose other than prosecuting, defending or settling *Linde, et al. v. Arab Bank, PLC*, Case No. CV-04-2799; *Litle, et al. v. Arab Bank, PLC*, Case No. CV-04-5449; *Almog, et al. v. Arab Bank, PLC*, Case No. CV-04-5564; *Coulter, et al. v. Arab Bank, PLC*, Case No. CV-05-365; and *Afriat-Kurtzer, et al. v. Arab Bank, PLC*, Case No. CV-05-388.** Any additional cases that are designated by order of the Court for cooperative or consolidated discovery with the foregoing cases shall by order therein be made subject to this Order and the parties thereto may use Confidential Information or Highly Confidential Information for no purpose other than prosecuting, defending or settling such cases. In no event shall Confidential Information or Highly Confidential Information be used for any business, competitive, personal, private, public, or other purposes, except as required by law.

Protective Order, ¶ 3, *Linde v. Arab Bank*, No. 04-2799 (E.D.N.Y. Aug. 1, 2005) (emphasis added) (attached as Ex. 4).

Counsel for the plaintiffs in these cases (*Almog* and *Afriat-Kurtzer*) also represent the *Burnett* and *Euro Brokers* plaintiffs in the MDL-1570 litigation, and are among the signatories to the *Arab Bank* Protective Order. It is not clear which of Plaintiffs' counsel in these cases have seen the *Arab Bank* documents listed on the Privilege Log or how the documents are responsive to requests for production in the instant Litigation. Plaintiffs have not obtained an order designating MDL-1570 for "cooperative or consolidated discovery" with the *Arab Bank* litigation. Thus, the *Arab Bank* discovery documents cannot be used by counsel in the MDL-1570 case for any purpose.

Plaintiffs' entry of documents subject to the *Arab Bank* Protective Order in the Privilege Log, however, suggests that the MDL-1570 plaintiffs and their counsel have been improperly using *Arab Bank* confidential documents in this Litigation, in direct contravention of the *Arab Bank* Protective Order. See *In re Zyprexa Injunction*, 474 F. Supp. 2d 385, 426-30 (E.D.N.Y. 2007), *aff'd sub nom. Eli Lilly & Co v. Gottstein*, 617 F.3d 186 (2d Cir. 2010) (sanctioning attorneys for improperly disclosing confidential discovery documents beyond the cases covered by the protective order); see also *Hunt v. Enzo Biochem, Inc.*, No. 06-170, 2012 WL 5199247, at \*6-7 (S.D.N.Y. Oct. 22, 2012) (sanctions for improperly disclosing confidential documents).

Having assessed confidential documents from the *Arab Bank* litigation for responsiveness and relevance to this litigation, the MDL-1570 Plaintiffs cannot now hide behind the *Arab Bank* Protective Order to prevent their disclosure to Moving Defendants. Plaintiffs should have sought permission to disclose these documents during the discovery period, but failed to do so. Moving Defendants seek an order compelling Plaintiffs to immediately seek such permission and turn over these responsive documents to defense counsel.

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**II. Lack of Sufficient Detail.**

Even if the documents underlying Plaintiffs' Privilege Log were potentially subject to privilege protection, Plaintiffs' Privilege Log does not satisfy the express requirements of SDNY Local Rule 26.2 or the Court's November 19, 2012 Order Governing Identification of Privileged Documents ("Order"). Both Local Rule 26.2 and the Order require that Plaintiffs' Privilege Log identify the following information:

- (i) the type of document;
- (ii) the general subject matter of the document;
- (iii) the date of the document;
- (iv) the authors of the document, the addressees of the document and any other recipients, and, where not apparent, the relationship of the authors, addressees, and recipients to one another; and
- (v) if the document is an electronic document, its file size.

**A. Subject Matter of Allegedly Privileged Documents.**

Plaintiffs failed to provide the general subject matter of any purportedly privileged FOIA request, i.e., the categories of information—including the names of any individuals and entities—sought by each FOIA request. Indeed, Plaintiffs failed even to provide a heading for the subject matter of any document. Rather, the Privilege Log contains merely a "Title Ref./Description." The title of a document alone does not afford the opposing party any way to assess the propriety of the assertion of privilege. *See Klig v. Deloitte LLP*, C.A. No. 4993-VCL, 2010 WL 3489735, at \*5-6 (Del. Ch. Sept. 7, 2010) (finding a waiver of privilege because a party's log contained only boilerplate information about the logged documents). In addition, Plaintiffs have failed to list separately on their Privilege Log any of the documents produced by governmental agencies in response to FOIA requests. Instead, Plaintiffs merely show these documents as a "Yes" in an attachments field, without providing any details about those attachments.

Plaintiffs' log entries for the *Arab Bank* documents are also deficient. For example, Plaintiffs have failed to identify a single author or recipient for any of the *Arab Bank* documents listed on their log.

**B. Defendants are Unable to Challenge Individual Log Entries.**

Additionally, Plaintiffs failed to identify to which requests these allegedly privileged documents are responsive, or even to which defendant the "privileged" documents pertain. By omitting this information and by providing vague details about each document, Plaintiffs made it impossible for a defendant to assess whether an entry is responsive to the request of that defendant. Thus, a defendant needs to challenge all of the documents on the Privilege Log because it cannot determine what entries may be relevant to that defendant.

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**CONCLUSION**

For the foregoing reasons, the Moving Defendants respectfully request the Court to order Plaintiffs to produce all of the documents on Plaintiffs' Privilege Log, or in the alternative, to amend the Privilege Log to comply with S.D.N.Y. Local Rule 26.2 and the Court's November 19, 2012 Order, including an adequate description of each document and a delineation as to which defendant each entry pertains.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Steven T. Cottreau", followed by a vertical line and the initials "DAM".

Steven T. Cottreau

cc: MDL 1570 Plaintiffs' Executive Committees  
Alan Kabat, Bernabei & Wachtel, PLLC



# EXHIBIT 1

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley, <i>Co-Chair</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Paul J. Hanly, Jr., <i>Co-Liaison Counsel</i> HANLY CONROY BIERSTEIN SHERIDAN FISHER & HAYES LLP	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA FACSIMILE

October 19, 2012

The Honorable Frank Maas  
 United States District Court  
 Southern District of New York  
 Daniel Patrick Moynihan United States  
 Courthouse  
 500 Pearl Street, Room 740  
 New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (FM)

Dear Judge Maas:

On behalf of the Plaintiffs' Executive Committees, we write in response to the letter sent to Your Honor earlier today from Clifford Chance on behalf of the defendants about the parties' ongoing discussions concerning a framework for exchanging privilege logs in the above-referenced litigation. As the PECs expressed in their portion of the agenda letter sent to Your Honor yesterday, we believe that the log issue remains the subject of ongoing meet and confer discussions and would have preferred to finalize those discussions before raising this issue for the Court's consideration. The defendants insistence to shortcut that obligation by failing to engage in discussions until the last minute, then seeking to cram down their version of a proposed order at the 11-hour is frustrating, to say the least. The fact that the parties conferring remained incomplete is evidenced by the fact that, among the defendants' last communications to plaintiffs is a communication advising that, because defendants had not had time to circulate our proposal to other defendants for comment or consensus, they would wait to address the proposal at the hearing on Monday.

However, inasmuch as defendants have raised the issue for the Court's attention, plaintiffs are providing Your Honor with the (1) the language plaintiffs propose for the Stipulation Order (Attachment A), (2) a version of the proposed stipulation order that indicates in margin comments where the plaintiffs' version differs with the defendants' proposal (Attachment



The Honorable Frank Maas, U.S.M.J.  
October 19, 2012  
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B), (3) the plaintiffs' correspondence with defendants explaining the plaintiffs' rationale for the plaintiffs' proposal (Attachments C and D).

Plaintiffs note the following differences, as indicated in the margins of Attachment B.

**1. The Date Privilege Attaches to Defendants' Communications with Their Counsel Should Mirror the Date the Duty to Preserve Begins. [See Proposed Stipulation 1.(i) and Comment A1.]**

The first dispute concerns when privilege attaches to a defendant's communications with that defendant's counsel. Defendants contend that privilege attaches to their communication on after September 10, 2001, based on the theory that even before a complaint was filed and served they may have communicated with counsel in anticipation of litigation. Plaintiffs have countered that that view is not consonant with at least some defendants' view that their obligation to preserve documents did not begin on September 11, 2001. Accordingly, plaintiffs have recommended that the provision proposed for paragraph 1.(i) should create consistency between a defendant's position on privilege and its position on the date a duty to preserve evidence attached. For example, if a defendant argues that its duty to preserve evidence attaches later, then the privilege should not attach until that time either. Plaintiffs have proposed the following language:

"Any defendant asserting that its duty to preserve evidence did not attach until after September 11, 2001, shall identify in its privilege log any communications with counsel for which it is claiming privilege between September 10, 2001 and the date on which the defendant claims that its duty to preserve evidence attached."

**2. The Extent to Which Defendants' Counsels' Communications Are Excluded Form a Privilege Log Should Be Determined Based on the Authorizations the Defendants Accepted in CMO # 5. [See Proposed Stipulation 1.(iii) and Comment A2.]**

The second dispute concerns whether communication among defense counsel is entitled to be broadly recognized as privileged and omitted from the privilege logs. Despite repeated requests, defendants have offered little explanation as to why communications among defendants' counsel should be privileged. And contrary to defendants' letter to the Court, plaintiffs have explained the reason for the distinct difference between plaintiffs' counsels' communication and theirs.

Since the outset of this litigation, defendants have emphasized the varying interests of each of the defendants and used those varying interests as a premise to resist the organizational structure and authority of the Defendants' Executive Committee ("DEC"). Only after plaintiffs complained about the inability to coordinate even minor procedural matters with the defendants, the defendants crafted their own Case Management Order ("CMO") that specifically and strictly

The Honorable Frank Maas, U.S.M.J.  
October 19, 2012  
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limited the authority of the DEC to four items specifically set out in the CMO. The order, crafted by the defendants, provides for the following strictly limited authority for the DEC:

- a. To confer and agree with the Plaintiffs' Executive Committees on scheduling matters relating to court hearings, depositions, and deadlines affecting Defendants generally, and on proposed agenda items for court hearings;
- b. To coordinate communications with counsel for any Plaintiff seeking the consent of Defendants generally to a nondispositive motion;
- c. To coordinate the examination of witnesses by defense counsel at a deposition or hearing; and
- d. To coordinate communications with Plaintiffs' Executive Committees and with the Court concerning any requested changes in this Case Management and Pretrial Scheduling Order.

CMO #5, Docket Entry # 1547 (filed December 9, 2005). In fact, the order even states that aside from these four areas of authority, the DEC "shall have ... no other authority."

These limited responsibilities stand in stark contrast with the broad obligations and authority the Court imposed on the PECs in CMO #3, Docket Entry # 248 (filed June 16, 2004). In CMO # 3, the Court authorized the PECs to fulfill its responsibilities by conducting a wide range of tasks, concluding with the authority to "otherwise coordinate the work of plaintiffs' counsel and perform such other functions as necessary and appropriate to complete pretrial proceedings in [03 MDL 1570] as may be authorized by the Court."

Although defense counsel have expressed division among themselves and resisted the same type of coordination to which the plaintiffs' counsel have agreed, plaintiffs have expressed willingness to compromise to exclude from the log those communications among defendants' counsel which are within the authorizations described in CMO # 5, paragraph 1.(a) to 1.(d).

To the extent that defendants insist that a broader recognition of a privilege is warranted, plaintiffs request that the Court direct them to make an application to the Court and allow the issue to be fully brief.

**3. The Framework for the Proposed Privilege Log Should be Informed By the Facciola-Redgrave Framework Recommended By Judge Maas During the April 12, 2011 Conference. [See Proposed Stipulation 3.(i), 5, 6 and Comments A3-A6 and A8-A11, and Transcript of April 12, 2011 Conference, at 61.]**

Although plaintiffs do not dispute that the items referenced in Local Rule 26.2 should be included on the proposed privilege logs, plaintiffs have recommended incorporation of proposals included in the article by Judge Facciola concerning privilege logs, which the court recommended to the parties during the April 12, 2011 conference in this matter. *See* John M. Facciola and Jonathan M. Redgrave, *Asserting and Challenging Privilege Claims in Modern Litigation: The Facciola-Redgrave Framework*, *Federal Courts L. Rev.* Vol. 4, Issue 1, at 48-49 (hereinafter "Facciola"). While the plaintiffs appreciate the defendants focus on simplifying the

The Honorable Frank Maas, U.S.M.J.

October 19, 2012

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process of creating the logs, inclusion of the several additional items of information suggested in the Facciola article will also help to distill which privilege claims will be disputed, help the parties engage in meaningful meet and confers to distill what issues need to be brought to the courts attention, and help the court to work through the disputes that are brought to the Court for resolution.

**4. Dates Provided in Privilege Logs Should Include Western (*i.e.*, Gregorian) dates.  
[See Proposed Stipulation 5 (vi) and Comment A7.]**

Many documents in this litigation present with dates that are not in Western format. Plaintiffs merely propose, and the defendants oppose, that to the extent that the date on the document is depicted in non-Western format (*e.g.*, a Hijra date), in addition to providing the date depicted in the document, a Western date (*i.e.*, Gregorian date) should be provided in the log where it is possible to discern that date.

Respectfully submitted,

/s/ Robert T. Haefele

ROBERT T. HAEFELE  
FOR THE MDL 1570 PLAINTIFFS' EXECUTIVE  
COMMITTEES

cc: Hon. George B. Daniels (By Federal Express)  
MDL-1570 counsel (By electronic mail)

# Exhibit A

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re Terrorist Attacks on September 11, 2001

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)  
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)  
) 03 MDL 1570 (GBD)(FM)  
) ECF Case  
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This document relates to: ALL ACTIONS

**STIPULATION ORDER**  
**GOVERNING IDENTIFICATION OF PRIVILEGED DOCUMENTS**

WHEREAS, Magistrate Judge Maas has asked that the parties meet and confer regarding an agreement concerning the listing of privileged documents on a privilege log;

WHEREAS, the parties have conferred about this issue; and

WHEREAS, the parties wish to decrease the burdens associated with creating privilege logs concerning certain communications after the filing of the first complaint in the above-captioned litigation on August 15, 2002;

IT IS HEREBY AGREED by Plaintiffs and the remaining Defendants in the above-captioned action that:

1. The parties need not include the following types of documents on privilege logs in this matter:
  - (i) Communication between (i) plaintiffs' counsel and their clients, including then-current officers and employees of the clients, after September 10, 2001; and (ii) each defendant's counsel and that counsel's client(s), including then-current officers and employees of the client(s), after September 10, 2001; Any defendant asserting that its duty to preserve evidence did not attach until after September 11, 2001, shall identify in its privilege log any communications with counsel for which it is claiming privilege between September 10, 2001 and the date on which the defendant claims that its duty to preserve evidence attached;

- (ii) Communications between or among plaintiffs' counsel;
- (iii) Communications between or among defense counsel to the extent that such communications were within the specific authority that the Court recognized for the Defendants' Executive Committee in Case Management Order # 5 (D.E. 1547, filed December 9, 2005), namely:
  - To confer and agree with the Plaintiffs' Executive Committees on scheduling matters relating to court hearings, depositions, and deadlines affecting Defendants generally, and on proposed agenda items for court hearings;
  - To coordinate communications with counsel for any Plaintiff seeking the consent of Defendants generally to a nondispositive motion;
  - To coordinate the examination of witnesses by defense counsel at a deposition or hearing; and
  - To coordinate communications with Plaintiffs' Executive Committees and with the Court concerning any requested changes in this Case Management and Pretrial Scheduling Order;
- (iv) Pursuant to Fed. R. Civ. Proc. 26(b)(3)(A) and (B) and 26(b)(4)(B) and (C), drafts of any expert reports or disclosures required under Rule 26(a)(2), unless otherwise discoverable under Fed. R. Civ. P. 26(b)(3)(A)(i), (ii);
- (v) Pursuant to Fed. R. Civ. Proc. 26(b)(4)(C), all protected communications between a party's counsel and any witness required to provide a report under Rule 26(a)(2)(B), except to the extent that the communications fall within the categories described in Rule 26(b)(4)(C)(i), (ii), or (iii), unless otherwise discoverable under Fed. R. Civ. P. 26(b)(3)(A)(i), (ii);
- (vi) Pursuant to Fed. R. Civ. Proc. 26(b)(4)(D), any facts known or opinions held by an expert who has been retained or specially employed by another party in anticipation of litigation or to prepare for trial and who is not expected to be called as a witness at trial, except as such discovery is permitted under Rule 26(b)(4)(D)(i) and (ii); and
- (vii) Such other categories that the parties may agree upon or the court may order as discovery proceeds (*i.e.*, this stipulation order has been



entered based on the status of existing discovery requests and additional categories of exclusion may be added as discovery continues to unfold); and

2. For the purpose of the foregoing paragraph, the term "counsel" includes the parties' attorneys, and the attorneys' staff, employees, and consultants or experts not anticipated to testify at trial; and
3. To the extent that a party seeks to claim privilege or protection over a category of documents, rather than on a document-by-document basis, the parties shall meet and confer at least fourteen days before the privilege log is due in an effort to determine the categories of documents to be withheld:
  - (i) During the meet and confer, the withholding party shall set forth (a) a description of the proposed category, including a description of the general subject matter of the documents in each such category, (b) the basis for the withholding of documents in each such category, and (c) to the extent possible, the withholding party shall provide an objective index of readily available information about the documents in the category to aid the parties in understanding the universe of documents at issue (*e.g.*, authors, recipients, dates, bates numbers, file size, etc.);
  - (ii) For each proposed category, the requesting party may request or the producing party may offer an affidavit attesting to the facts that support the privileged or protected status of documents within the category; The affidavit need not identify or address the documents on an individual basis, but shall serve to provide the evidentiary context and support for the category as a whole;
  - (iii) Unless and until the Court determines otherwise, under the authority of Rule 502(d), the sharing of information in the meet and confer process conducted pursuant to Paragraph 2 regarding documents that are claimed to be privileged or otherwise protected is to be held confidential and will not be deemed a waiver of any privileges, and the intentional or inadvertent inclusion of privileged in an index or privilege log will not be deemed a waiver of any privileges;
  - (iv) To the extent the parties can agree that a category may be excluded from production, the parties will submit a joint proposal to amend this stipulation order to add the category to paragraph 1;

- (v) To the extent the parties cannot agree that a category may be excluded and the producing party continues to assert in good faith a claim of privilege or protection over the category, the producing party shall present the discovery dispute for the court's consideration within five business days of either party's determination that the meet and confer has concluded, and the requesting party may respond to the application within five business days; and
4. The parties shall produce privilege logs no longer than 45 days from the state of the Court's entry of this Stipulation for any privileged documents withheld from the production due on August 30, 2012, and the parties shall produce privilege logs for any future productions within 45 days following such production; and
5. Subject to the foregoing modifications, the parties shall produce privilege logs that conform to the Federal Rules of Civil Procedure and Local Rule 26.2 (2012), and to the extent that divulgence of such information does not cause disclosure of the allegedly privileged information, shall identify the following information:
- (i) Unique document identification number (*e.g.*, bates numbers);
  - (ii) Document type (*e.g.*, letter or memorandum);
  - (iii) General subject matter of the document;
  - (iv) Document length and, where applicable, file size;
  - (v) Identification and description of attachments;
  - (vi) Date (in Western format);
  - (vii) Author;
  - (viii) Copyees and/or Addressees;
  - (ix) Other Recipients;
  - (x) Description of the relationship of the author, copyees/addressees, and recipients to each other;
  - (xi) Categories;
  - (xii) The basis for the claimed privileges or protections and, if the privilege is governed by state law, indicate the state's privilege rule being invoked, including information sufficient to establish the elements of each asserted privilege invoked, or protection meeting agreed-upon criteria; and
6. Instructions for inclusion of certain items of information: To the extent that any of the following categories of information are included on a privilege log, the following instructions shall apply:

- (i) E-mail strings: The parties shall include the "last-in-time" email in a string provided that (a) each separate communication in the chain is at some point the "last-in-time" e-mail in a string, and (b) the index or privilege log notes that the e-mail communication is part of a string. If an embedded e-mail communication is not otherwise available, then it must be identified and included. To the extent that a portion of a string is produced (no privilege or protection is claimed), that portion of the string need not be separately included in the privilege log;
- (ii) Attachments: Attachments to emails and other documents should be identified as attachments and separately included with an indication as to which email or document said attachment(s) were attached.

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THE MDL 1570 PLAINTIFFS' EXECUTIVE  
COMMITTEES

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THE DEFENDANTS' EXECUTIVE  
COMMITTEE

SO ORDERED:

This \_\_\_\_ day of October 2012

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Magistrate Judge Frank Maas

# Exhibit B

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

\_\_\_\_\_  
)  
)  
)  
) 03 MDL 1570 (GBD)(FM)  
In re Terrorist Attacks on September 11, 2001 ) ECF Case  
)  
)  
)  
\_\_\_\_\_

This document relates to: ALL ACTIONS

**STIPULATION ORDER**  
**GOVERNING IDENTIFICATION OF PRIVILEGED DOCUMENTS**

WHEREAS, Magistrate Judge Maas has asked that the parties meet and confer regarding an agreement concerning the listing of privileged documents on a privilege log;

WHEREAS, the parties have conferred about this issue; and

WHEREAS, the parties wish to decrease the burdens associated with creating privilege logs concerning certain communications after the filing of the first complaint in the above-captioned litigation on August 15, 2002;

IT IS HEREBY AGREED by Plaintiffs and the remaining Defendants in the above-captioned action that:

1. The parties need not include the following types of documents on privilege logs in this matter:

(i) Communication between (i) plaintiffs' counsel and their clients, including then-current officers and employees of the clients, after September 10, 2001; and (ii) each defendant's counsel and that counsel's client(s), including then-current officers and employees of the client(s), after September 10, 2001; Any defendant asserting that its duty to preserve evidence did not attach until after September 11, 2001, shall identify in its privilege log any communications with counsel for which it is claiming privilege between September 10, 2001 and the date on which the defendant claims that its duty to preserve evidence attached.

**Comment [A1]:** There needs to be consistency between a defendant's position on this issue and its position on the date a duty to preserve evidence attached. For example, if a defendant argues that its duty to preserve evidence attaches later, then the privilege should not attach until that time either.

One solution might be to add the following language to what has been proposed for 1.(i):

"Any defendant asserting that its duty to preserve evidence did not attach until after September 11, 2001, shall identify in its privilege log any communications with counsel for which it is claiming privilege between September 10, 2001 and the date on which the defendant claims that its duty to preserve evidence attached."

(ii) Communications between or among plaintiffs' counsel;

(iii) Communications between or among defense counsel to the extent that such communications were within the specific authority that the Court recognized for the Defendants' Executive Committee in Case Management Order # 5 (D.E. 1547, filed December 9, 2005), namely:

- To confer and agree with the Plaintiffs' Executive Committees on scheduling matters relating to court hearings, depositions, and deadlines affecting Defendants generally, and on proposed agenda items for court hearings;
- To coordinate communications with counsel for any Plaintiff seeking the consent of Defendants generally to a nondispositive motion;
- To coordinate the examination of witnesses by defense counsel at a deposition or hearing; and
- To coordinate communications with Plaintiffs' Executive Committees and with the Court concerning any requested changes in this Case Management and Pretrial Scheduling Order;

(iv) Pursuant to Fed. R. Civ. Proc. 26(b)(3)(A) and (B) and 26(b)(4)(B) and (C), drafts of any expert reports or disclosures required under Rule 26(a)(2), unless otherwise discoverable under Fed. R. Civ. P. 26(b)(3)(A)(i), (ii);

(v) Pursuant to Fed. R. Civ. Proc. 26(b)(4)(C), all protected communications between a party's counsel and any witness required to provide a report under Rule 26(a)(2)(B), except to the extent that the communications fall within the categories described in Rule 26(b)(4)(C)(i), (ii), or (iii), unless otherwise discoverable under Fed. R. Civ. P. 26(b)(3)(A)(i), (ii);

(vi) Pursuant to Fed. R. Civ. Proc. 26(b)(4)(D), any facts known or opinions held by an expert who has been retained or specially employed by another party in anticipation of litigation or to prepare for trial and who is not expected to be called as a witness at trial, except as such discovery is permitted under Rule 26(b)(4)(D)(i) and (ii); and

**Comment [A2]:** Although plaintiffs have asked, defendants have offered little explanation as to why communications among defendants' counsel should be privileged. In recent discussions, defense counsel explained that, to the extent that they communicated among members of the Defendants' Executive Committees as directed by the Court (e.g., to draft coordinated discovery requests, to propose agenda items), those communications should enjoy the privilege.

Since the outset of this litigation, defendants have emphasized the varying interests of each of the defendants and used those varying interests as a premise to resist the organizational structure and authority of the DEC. Only after plaintiffs complained about the inability to coordinate even minor procedural matters with the defendants, the defendants crafted their own CMO that specifically and strictly limited the authority of the DEC to four items specifically set out in the CMO. The order, crafted by the defendants, even states that aside from these four areas of authority, the DEC shall have "no other authority." See CMO #5, Docket Entry # 1547, (filed December 9, 2005).

The limited responsibilities authorized in CMO # 5 stands in stark contrast with the broad obligations and authority the Court imposed on the PECs in CMO #3, Docket Entry # 248 (filed June 16, 2004). In CMO # 3, the Court authorized the PECs to fulfill its responsibilities by conducting a wide range of tasks, concluding with the authority to "otherwise coordinate the work of plaintiffs' counsel and perform such other functions as necessary and appropriate to complete pretrial proceedings in [03 MDL 1570] as may be authorized by the Court.

Although defense counsel have expressed division among themselves and resisted the same type of coordination that the plaintiffs' counsel have agreed to, plaintiffs are willing to compromise to exclude from the log those communications among defendants' counsel which are within the authorizations described in CMO # 5, paragraph 1.(a) to 1.(d).

Plaintiffs recommend that, to the extent that defendants would like a broader recognition of the privilege, they make an application to the court to fully brief the issue.



- (vii) Such other categories that the parties may agree upon or the court may order as discovery proceeds (*i.e.*, this stipulation order has been entered based on the status of existing discovery requests and additional categories of exclusion may be added as discovery continues to unfold); and
2. For the purpose of the foregoing paragraph, the term "counsel" includes the parties' attorneys, and the attorneys' staff, employees, and consultants or experts not anticipated to testify at trial; and
  3. To the extent that a party seeks to claim privilege or protection over a category of documents, rather than on a document-by-document basis, the parties shall meet and confer at least fourteen days before the privilege log is due in an effort to determine the categories of documents to be withheld:
    - (i) During the meet and confer, the withholding party shall set forth (a) a description of the proposed category, including a description of the general subject matter of the documents in each such category, (b) the basis for the withholding of documents in each such category, and (c) to the extent possible, the withholding party shall provide an objective index of readily available information about the documents in the category to aid the parties in understanding the universe of documents at issue (*e.g.*, authors, recipients, dates, bates numbers, file size, etc.);
    - (ii) For each proposed category, the requesting party may request or the producing party may offer an affidavit attesting to the facts that support the privileged or protected status of documents within the category; The affidavit need not identify or address the documents on an individual basis, but shall serve to provide the evidentiary context and support for the category as a whole;
    - (iii) Unless and until the Court determines otherwise, under the authority of Rule 502(d), the sharing of information in the meet and confer process conducted pursuant to Paragraph 2 regarding documents that are claimed to be privileged or otherwise protected is to be held confidential and will not be deemed a waiver of any privileges, and the intentional or inadvertent inclusion of privileged in an index or privilege log will not be deemed a waiver of any privileges;
    - (iv) To the extent the parties can agree that a category may be excluded from production, the parties will submit a joint proposal to amend this stipulation order to add the category to paragraph 1;

**Comment [A3]:** This provision is part of what was suggested in Judge Facciola's law review article. See John M. Facciola and Jonathan M. Redgrave, "Asserting and Challenging Privilege Claims in Modern Litigation: The Facciola-Redgrave Framework," Federal Courts L. Rev. Vol. 4, Issue 1, at 48-49 (hereinafter "Facciola").

The provision is essential to minimize the number of disputes and to enable the parties to engage in a meaningful M&C dialogue as to how a claimed privilege is supportable.

- (v) To the extent the parties cannot agree that a category may be excluded and the producing party continues to assert in good faith a claim of privilege or protection over the category, the producing party shall present the discovery dispute for the court's consideration within five business days of either party's determination that the meet and confer has concluded, and the requesting party may respond to the application within five business days; and
4. The parties shall produce privilege logs no longer than 45 days from the state of the Court's entry of this Stipulation for any privileged documents withheld from the production due on August 30, 2012, and the parties shall produce privilege logs for any future productions within 45 days following such production; and
5. Subject to the foregoing modifications, the parties shall produce privilege logs that conform to the Federal Rules of Civil Procedure and Local Rule 26.2 (2012), and to the extent that divulgence of such information does not cause disclosure of the allegedly privileged information, shall identify the following information:
- (i) Unique document identification number (e.g., bates numbers);
  - (ii) Document type (e.g., letter or memorandum);
  - (iii) General subject matter of the document;
  - (iv) Document length and, where applicable, file size;
  - (v) Identification and description of attachments;
  - (vi) Date (in Western format);
  - (vii) Author;
  - (viii) Copyees and/or Addressees;
  - (ix) Other Recipients;
  - (x) Description of the relationship of the author, copyees/addressees, and recipients to each other;
  - (xi) Categories;
  - (xii) The basis for the claimed privileges or protections and, if the privilege is governed by state law, indicate the state's privilege rule being invoked, including information sufficient to establish the elements of each asserted privilege invoked, or protection meeting agreed-upon criteria; and
6. Instructions for inclusion of certain items of information: To the extent that any of the following categories of information are included on a privilege log, the following instructions shall apply:

**Comment [A4]:** This item is one of the items suggested for inclusion in Facciola at 48-49.

It is important to facilitate the parties' and the court's review and assessment.

**Comment [A5]:** This item is one of the items suggested for inclusion in Facciola at 48-49.

It is important to help define disputes and to facilitate the parties' and the court's review and assessment.

**Comment [A6]:** This item is one of the items suggested for inclusion in Facciola at 48-49.

It is important to help define disputes and to facilitate the parties' and the court's review and assessment.

**Comment [A7]:** To the extent that the date on the document is depicted in non-Western format (e.g., a Hijra date), in addition to providing the date depicted in the document, a Western date (i.e., Gregorian date) should be provided in the log where it is possible to discern that date.

**Comment [A8]:** This item is one of the items suggested for inclusion in Facciola at 48-49.

It is important to help define disputes and to facilitate the parties' and the court's review and assessment.

**Comment [A9]:** This item is one of the items suggested for inclusion in Facciola at 48-49.

It is important to help define disputes and to facilitate the parties' and the court's review and assessment.

- (i) E-mail strings: The parties shall include the "last-in-time" email in a string provided that (a) each separate communication in the chain is at some point the "last-in-time" e-mail in a string, and (b) the index or privilege log notes that the e-mail communication is part of a string. ~~It is not necessary to separately index each e-mail in a string if the entire string is privileged.~~ If an embedded e-mail communication is not otherwise available, then it must be identified and included. To the extent that a portion of a string is produced (no privilege or protection is claimed), that portion of the string need not be separately included in the privilege log;
- (ii) Attachments: Attachments to emails and other documents should be identified as attachments and separately included with an indication as to which email or document said attachment(s) were attached.

**Comment [A10]:** This item is stated as suggested for inclusion in Facciola at 48-49. Since each email entry is a separate "document," which (for example) may have been to, from, or cc'd to a non-privilege person, each needs to be separately logged for consideration, and enable the parties to engage in dialogue about the validity of privilege claims and provide the court with sufficient indicia as to the validity of the claim.

It is important to help define disputes and to facilitate the parties' and the court's review and assessment.

**Comment [A11]:** The phrasing suggested comes from the language in Judge Facciola's law review article. See Facciola, Vol. 4, Issue 1, at 49.

It is important to help define disputes and to facilitate the parties' and the court's review and assessment.

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THE MDL 1570 PLAINTIFFS' EXECUTIVE  
COMMITTEES

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THE DEFENDANTS' EXECUTIVE  
COMMITTEE

SO ORDERED:

This \_\_\_\_ day of October 2012

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Magistrate Judge Frank Maas

# Exhibit C

## MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, <i>Co-Chair</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Paul J. Hanly, Jr., <i>Co-Liaison Counsel</i> HANLY CONROY BIERSTEIN SHERIDAN FISHER & HAYES LLP	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA Electronic Mail

August 3, 2012

Alan R. Kabat, Esq.  
BERNABEI & WACHTEL, PLLC  
1775 T Street, NW  
Washington, DC 20009-7124

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (FM)

Dear Mr. Kabat:

Attached for discussion purposes is plaintiffs' initial proposal for a stipulation regarding the privilege log. Although we are sending this to you now for discussion purposes, we anticipate that we may have several additional suggestions that we have not quite finished thinking through; but to help us start the process we are offering the attached. Please circulate our proposal among your side and let us know a convenient time to meet and confer about the issue.

In addition, because the tone of each of your emails about the stipulation has implied some urgency or impatience about the progress of this project, we wanted to address that tone. Because I understand that Clifford Chance played some role in drafting your proposal and that at least some of the other defendants have encouraged you to pressure plaintiffs since you sent your proposal, our comments here are not necessarily intended to be directed at you, Alan, alone. But for a variety of reasons, we take issue with the tone of your emails and the implication that the chain in your last email accurately represents the history and current state of the negotiations about this stipulation.

As you know, defendants took on the responsibility of drafting a proposal for plaintiffs' consideration at least as early as our video conference meet and confer in March 2011. We never got any proposal for consideration until you provided something for us to consider in March 2012. So perhaps you can understand our view that the comment in your last email that "it should not take anyone four months to address this issue" comes off a bit ironic to us. Your email is misleading in that it implies that the starting point of our discussions concerning the stipulation dates back to only late March 2012, when in reality there was a full one-year gap where plaintiffs were waiting for a proposal from the defendants.

cc: Jodi Westbrook Flowers, Esq. (Via Electronic Mail)  
Sean P. Carter, Esq. (Via Electronic Mail)  
J. Scott Tarbutton, Esq. (Via Electronic Mail)  
John M. Eubanks, Esq. (Via Electronic Mail)  
James P. Kreindler, Esq. (Via Electronic Mail)  
Andrew J. Maloney, Esq. (Via Electronic Mail)  
Jerry S. Goldman, Esq. (Via Electronic Mail)



# Exhibit D

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley, <i>Co-Chair</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Paul J. Hanly, Jr., <i>Co-Liaison Counsel</i> HANLY CONROY BIERSTEIN SHERIDAN FISHER & HAYES LLP	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

**VIA Electronic Mail**

October 16, 2012

Alan R. Kabat, Esq.  
BERNABEI & WACHTEL, PLLC  
1775 T Street, NW  
Washington, DC 20009-7124

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (FM)

Dear Mr. Kabat:

In response to the proposal that you sent to us on October 3, 2012, attached are plaintiffs' comments about the proposed stipulation concerning a privilege log. As you can see from the comments, we have two generally overarching concerns.

First, when we sent you our proposal on August 3, we were clear that much of what we added was added after considering the *Facciola-Redgrave* framework that Judge Maas recommended that we consider. Although you have opted to delete much of what was added from that framework, you have not explained why we should not employ the framework that the Court suggested.

Second, You have not responded to our specific request that you explain why the communications among defendants' counsel, who have worked largely independent of one another and have identified diverging interests, would be subject to a privilege. Instead of offering any explanation, you have merely pointed out that counsel for certain plaintiffs who have never had claims against the active defendants have worked apart from the PECs. The misleading anecdotal example, which ignores the constant close coordination among the PECs, does nothing to explain why the privilege suggested should be recognized.

We suggest that you take a second review of the proposal and either offer explanations for the items where explanation is requested, accept the language as we have proposed, or suggest substitute language with an explanation as to why the substitute is better.

Sincerely,

/s/

ROBERT T. HAEFELE  
FOR THE MDL 1570 PLAINTIFFS' EXECUTIVE  
COMMITTEES

cc: Jodi Westbrook Flowers, Esq. (Via Electronic Mail)  
Sean P. Carter, Esq. (Via Electronic Mail)

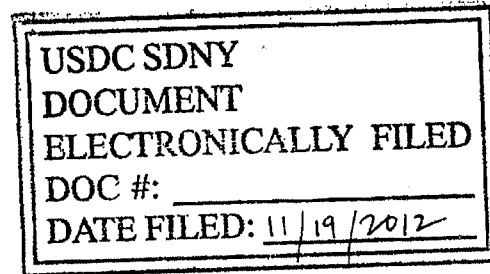
Alan R. Kabat, Esq.  
October 16, 2012  
Page 2

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J. Scott Tarbutton, Esq. (Via Electronic Mail)  
John M. Eubanks, Esq. (Via Electronic Mail)  
James P. Kreindler, Esq. (Via Electronic Mail)  
Andrew J. Maloney, Esq. (Via Electronic Mail)  
Jerry S. Goldman, Esq. (Via Electronic Mail)

# EXHIBIT 2

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK



In re Terrorist Attacks on September 11,  
2001

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)  
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) 03 MDL 1570 (GBD)(FM)  
) ECF Case  
)  
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This document relates to: ALL ACTIONS

**ORDER**  
**GOVERNING IDENTIFICATION OF PRIVILEGED DOCUMENTS**

WHEREAS, the Court has conferred with counsel concerning the listing of privileged documents on a privilege log; and

WHEREAS, the Court has considered counsel's competing positions concerning certain portions of a proposed order relating to that subject;

IT IS HEREBY ORDERED that:

1. The parties need not include the following types of documents on privilege logs in this matter:
  - (i) Communication between (i) plaintiffs' counsel and their clients, including then-current officers and employees of the clients, after September 10, 2001; and (ii) each defendant's counsel and that counsel's client(s), including then-current officers and employees of the client(s), after September 10, 2001;
  - (ii) Communications between or among plaintiffs' counsel;
  - (iii) Communications between or among defense counsel;
  - (iv) Pursuant to Fed. R. Civ. Proc. 26(b)(3)(A) and (B) and 26(b)(4)(B) and (C), drafts of any expert reports or disclosures required under Rule

26(a)(2), unless otherwise discoverable under Fed. R. Civ. P. 26(b)(3)(A)(i), (ii);

(v) Pursuant to Fed. R. Civ. Proc. 26(b)(4)(C), all protected communications between a party's counsel and any witness required to provide a report under Rule 26(a)(2)(B), except to the extent that the communications fall within the categories described in Rule 26(b)(4)(C)(i), (ii), or (iii), unless otherwise discoverable under Fed. R. Civ. P. 26(b)(3)(A)(i), (ii);

(vi) Pursuant to Fed. R. Civ. Proc. 26(b)(4)(D), any facts known or opinions held by an expert who has been retained or specially employed by another party in anticipation of litigation or to prepare for trial and who is not expected to be called as a witness at trial, except as such discovery is permitted under Rule 26(b)(4)(D)(i) and (ii); and

(vii) Such other categories as the parties may agree upon or the court may order as discovery proceeds (*i.e.*, this stipulation order has been entered based on the status of existing discovery requests and additional categories of exclusion may be added as discovery continues to unfold).

2. For the purpose of the foregoing paragraph, the term "counsel" includes the parties' attorneys, and the attorneys' staff, employees, and consultants or *experts* not anticipated to testify at trial.

3. To the extent that a party seeks to claim privilege or protection over a category of documents, rather than on a document-by-document basis, the parties shall meet and confer at least fourteen days before the privilege log is due in an effort to determine the categories of documents to be withheld:

(i) During the meet and confer, the withholding party shall set forth (a) a description of the proposed category, including a description of the general subject matter of the documents in each such category, and (b) the basis for the withholding of documents in each such category;

(ii) For each proposed category, the requesting party may request or the producing party may offer an affidavit attesting to the facts that support the privileged or protected status of documents within the category; The affidavit need not identify or address the documents on an individual basis, but shall serve to provide the evidentiary context and support for the category as a whole;

- (iii) Unless and until the Court determines otherwise, under the authority of Rule 502(d), the sharing of information in the meet and confer process conducted pursuant to Paragraph 2 regarding documents that are claimed to be privileged or otherwise protected is to be held confidential and will not be deemed a waiver of any privileges, and the intentional or inadvertent inclusion of privileged in an index or privilege log will not be deemed a waiver of any privileges;
  - (iv) To the extent the parties can agree that a category may be excluded from production, the parties will submit a joint proposal to amend this stipulation order to add the category to paragraph 1;
  - (v) To the extent the parties cannot agree that a category may be excluded and the producing party continues to assert in good faith a claim of privilege or protection over the category, the producing party shall present the discovery dispute for the court's consideration within five business days of either party's determination that the meet and confer has concluded, and the requesting party may respond to the application within five business days.
4. The parties shall produce privilege logs no longer than 45 days from the state of the Court's entry of this Stipulation for any privileged documents withheld from the production due on August 30, 2012, and the parties shall produce privilege logs for any future productions within 45 days following such production.
5. Subject to the foregoing modifications, the parties shall produce privilege logs that conform to the Federal Rules of Civil Procedure and Local Rule 26.2 (2012), and to the extent that divulgence of such information does not cause disclosure of the allegedly privileged information, shall identify the following information:
- (i) the type of document;
  - (ii) the general subject matter of the document;
  - (iii) the date of the document
  - (iv) the authors of the document, the addressees of the document and any other recipients, and, where not apparent, the relationship of the authors, addressees, and recipients to one another; and
  - (v) if the document is an electronic document, its file size.
6. The basis for the privileges or protections claimed, and, if the privilege is governed by state law, the state's privilege rule being invoked.




7. Instructions for inclusion of certain items of information: To the extent that any of the following categories of information are included on a privilege log, the following instructions shall apply:

(i) E-mail strings: The parties shall include the "last-in-time" email in a string provided that (a) each separate communication in the chain is at some point the "last-in-time" e-mail in a string, and (b) the index or privilege log notes that the e-mail communication is part of a string. It is not necessary to index separately each e-mail in a string if the authors and addressees are unchanged throughout the string. If an embedded e-mail communication is not otherwise available, then it must be identified and included. To the extent that a portion of a string is produced (no privilege or protection is claimed), that portion of the string need not be separately included in the privilege log;

(ii) Attachments: Attachments to emails and other documents should be identified as attachments and included in the entry for the email or other document to which said attachment(s) were attached.

SO ORDERED:

This 19th day of November 2012

  
\_\_\_\_\_  
FRANK MAAS  
United States Magistrate Judge

# EXHIBIT 3

**03-MDL-1570 Plaintiffs' Executive Committees'  
Privilege Log**

	Doc Type:	Doc Date:	Title Ref./Description:	Author Name:	Recipients:	Email String:	Attachments:	File Size:	Privilege/Protection:
1	Wire Transfer	3/15/1995	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212255			No	No	48 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
2	Wire Transfer	4/11/1995	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212256			No	No	48 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
3	Wire Transfer	10/27/1995	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212257			No	No	48 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
4	Account Statement	12/29/1995	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC009874			No	No	88 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
5	Wire Transfer	3/28/1996	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC215855			No	No	64 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
6	Wire Transfer	4/8/1996	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212259			No	No	47 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
7	Wire Transfer	4/15/1996	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212258			No	No	48 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
8	Wire Transfer	7/22/1996	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC211756			No	No	45 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.

**03-MDL-1570 Plaintiffs' Executive Committees'  
Privilege Log**

	Doc Type:	Doc Date:	Title Ref./Description:	Author Name:	Recipients:	Email String:	Attachments:	File Size:	Privilege/Protection:
9	Wire Transfer	7/24/1996	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212260			No	No	50 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
10	Wire Transfer	9/18/1996	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212261			No	No	50 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
11	Wire Transfer	9/18/1996	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212262			No	No	48 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
12	Wire Transfer	11/26/1996	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC211757			No	No	45 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
13	Wire Transfer	11/26/1996	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC211758			No	No	49 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
14	Wire Transfer	12/10/1996	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212263			No	No	48 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
15	Wire Transfer	12/12/1996	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212264			No	No	49 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
16	Wire Transfer	12/18/1996	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC211798			No	No	47 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.

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17	Wire Transfer	1/30/1997	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC211759			No	No	48 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
18	Wire Transfer	2/3/1997	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212265			No	No	49 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
19	Wire Transfer	2/20/1997	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC211760			No	No	48 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
20	Wire Transfer	2/20/1997	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC211761			No	No	45 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
21	Wire Transfer	2/25/1997	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC007062			No	No	64 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
22	Wire Transfer	2/28/1997	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC211762			No	No	48 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
23	Wire Transfer	2/28/1997	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC211763			No	No	44 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
24	Wire Transfer	3/3/1997	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212266			No	No	50 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.

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25	Wire Transfer	4/28/1997	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212990 - ABPLC212991			No	No	75 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
26	Wire Transfer	6/12/1997	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212704			No	No	55 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
27	Wire Transfer	6/12/1997	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212999			No	No	31 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
28	Wire Transfer	6/26/1997	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212267			No	No	50 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
29	Wire Transfer	7/3/1997	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212268			No	No	49 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
30	Wire Transfer	7/7/1997	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212269			No	No	49 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
31	Wire Transfer	9/15/1997	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212270			No	No	49 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
32	Wire Transfer	10/14/1997	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC007065			No	No	62 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.

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33	Wire Transfer	11/10/1997	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212484			No	No	46 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
34	Wire Transfer	1/2/1998	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212271			No	No	49 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
35	Wire Transfer	1/5/1998	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212189			No	No	45 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
36	Wire Transfer	1/7/1998	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212190			No	No	45 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
37	Wire Transfer	1/16/1998	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212273			No	No	50 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
38	Wire Transfer	1/27/1998	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC192044			No	No	71 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
39	Wire Transfer	2/23/1998	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212192			No	No	46 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
40	Wire Transfer	2/24/1998	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC211796			No	No	45 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.



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41	Wire Transfer	3/10/1998	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212988			No	No	47 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
42	Wire Transfer	3/10/1998	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212989			No	No	46 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
43	Wire Transfer	3/25/1998	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC211795			No	No	45 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
44	Wire Transfer	3/25/1998	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212194			No	No	44 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
45	Wire Transfer	3/25/1998	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212195			No	No	46 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
46	Wire Transfer	3/25/1998	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212196			No	No	45 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
47	Wire Transfer	4/16/1998	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC211794			No	No	45 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
48	Wire Transfer	4/30/1998	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212197			No	No	46 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.

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49	Wire Transfer	7/6/1998	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC211793			No	No	45 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
50	Wire Transfer	7/6/1998	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212198			No	No	45 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
51	Wire Transfer	8/4/1998	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212199			No	No	45 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
52	Wire Transfer	10/5/1998	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212272			No	No	47 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
53	Wire Transfer	10/20/1998	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212200			No	No	45 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
54	Wire Transfer	11/3/1998	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212987			No	No	45 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
55	Wire Transfer	11/3/1998	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC007085			No	No	62 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
56	Wire Transfer	11/23/1998	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212202			No	No	45 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.

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57	Wire Transfer	12/16/1998	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC211764			No	No	43 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
58	Wire Transfer	12/21/1998	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212986			No	No	31 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
59	Wire Transfer	12/21/1998	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC007088			No	No	62 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
60	Wire Transfer	12/24/1998	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212203			No	No	45 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
61	Wire Transfer	5/25/1999	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212985			No	No	31 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
62	Wire Transfer	5/26/1999	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212711			No	No	51 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
63	Wire Transfer	7/19/1999	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212274			No	No	48 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
64	Wire Transfer	7/20/1999	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212275			No	No	45 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.

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65	Wire Transfer	12/8/1999	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC211765			No	No	45 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
66	Wire Transfer	12/13/1999	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC007108			No	No	62 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
67	Wire Transfer	12/14/1999	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212949			No	No	30 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
68	Wire Transfer	1/19/2000	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212984			No	No	31 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
69	Wire Transfer	1/19/2000	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC007109			No	No	64 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
70	Wire Transfer	1/19/2000	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212716			No	No	50 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
71	Wire Transfer	2/10/2000	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212206			No	No	46 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
72	Wire Transfer	5/19/2000	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212276			No	No	48 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.

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73	Wire Transfer	6/27/2000	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212983			No	No	31 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
74	Wire Transfer	6/27/2000	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC007112			No	No	64 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
75	Wire Transfer	7/25/2000	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212277			No	No	48 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
76	Report	8/24/2000	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC005485 - ABPLC005506	Osman Asoli	Abdul Majeed Shoman	No	No	2056 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
77	Wire Transfer	9/1/2000	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212252			No	No	49 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
78	Wire Transfer	9/12/2000	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212207			No	No	45 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
79	Wire Transfer	10/5/2000	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212208			No	No	48 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
80	Wire Transfer	10/6/2000	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC215701			No	No	64 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.

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81	Wire Transfer	10/10/2000	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212253			No	No	48 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
82	Wire Transfer	10/16/2000	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212981			No	No	32 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
83	Bank Record	10/16/2000	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC188951			No	No	127 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
84	Wire Transfer	10/26/2000	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212720			No	No	30 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
85	Wire Transfer	10/26/2000	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212982			No	No	32 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
86	Wire Transfer	11/28/2000	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212254			No	No	48 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
87	Wire Transfer	11/28/2000	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212278			No	No	49 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
88	Wire Transfer	11/30/2000	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC213005			No	No	32 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.



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89	Wire Transfer	11/30/2000	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212980			No	No	30 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
90	Wire Transfer	11/30/2000	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212721			No	No	48 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
91	Wire Transfer	1/19/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212961			No	No	31 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
92	Wire Transfer	1/19/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC007118			No	No	65 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
93	Wire Transfer	1/19/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212723			No	No	49 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
94	Wire Transfer	2/6/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212279			No	No	49 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
95	Wire Transfer	2/8/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC211766			No	No	46 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
96	Wire Transfer	2/16/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC211768			No	No	47 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.



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97	Wire Transfer	2/16/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC211770			No	No	46 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
98	Wire Transfer	2/16/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC211767			No	No	46 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
99	Wire Transfer	2/16/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212280			No	No	30 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
100	Wire Transfer	4/27/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212765			No	No	28 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
101	Wire Transfer	5/15/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC007120			No	No	64 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
102	Wire Transfer	5/15/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212725			No	No	49 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
103	Wire Transfer	5/16/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC211769			No	No	45 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
104	Wire Transfer	5/22/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212979			No	No	32 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.

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105	Wire Transfer	5/22/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC007122			No	No	65 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
106	Wire Transfer	5/22/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212727			No	No	49 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
107	Wire Transfer	6/11/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212281			No	No	52 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
108	Wire Transfer	6/11/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212282			No	No	51 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
109	Wire Transfer	7/24/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212776			No	No	28 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
110	Wire Transfer	7/24/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212777			No	No	29 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
111	Wire Transfer	7/24/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212778			No	No	28 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
112	Wire Transfer	7/25/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212283			No	No	48 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.

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	Doc Type:	Doc Date:	Title Ref./Description:	Author Name:	Recipients:	Email String:	Attachments:	File Size:	Privilege/Protection:
113	Wire Transfer	8/8/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC196927 - ABPLC196928			No	No	151 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
114	Wire Transfer	9/10/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC191333			No	No	53 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
115	Report	9/10/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC005507 - ABPLC005524		Abdul Majeed Shoman	No	No	1710 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
116	Wire Transfer	9/25/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC191337			No	No	62 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
117	Wire Transfer	10/1/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC191324			No	No	62 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
118	Wire Transfer	10/4/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC191325			No	No	62 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
119	Wire Transfer	10/5/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212764			No	No	28 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
120	Wire Transfer	10/9/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC191328			No	No	54 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.

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121	Wire Transfer	10/18/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212942			No	No	30 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
122	Account Statement	10/21/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC211300			No	No	49 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
123	Wire Transfer	11/13/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC007127			No	No	62 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
124	Wire Transfer	11/14/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212998			No	No	30 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
125	Wire Transfer	11/23/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212284			No	No	49 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
126	Wire Transfer	11/23/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC007128			No	No	64 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
127	Wire Transfer	12/4/2001	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC192047 - ABPLC192048			No	No	126 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
128	Wire Transfer	1/7/2002	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212285			No	No	47 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.

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129	Wire Transfer	1/31/2002	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212286			No	No	49 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
130	Wire Transfer	2/20/2002	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212978			No	No	30 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
131	Wire Transfer	3/11/2002	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC007130			No	No	24 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
132	Wire Transfer	4/29/2002	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212287			No	No	45 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
133	Wire Transfer	4/29/2002	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212288			No	No	49 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
134	Report	5/2002	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC005861 - ABPLC005914			No	No	4775 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
135	Presentation	5/2002	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC003793 - ABPLC003832			No	No	1865 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
136	Wire Transfer	6/20/2002	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC213099			No	No	29 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.

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137	Wire Transfer	7/30/2002	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC008729	Kevin R. Smith, National Central Bureau Interpol, US Department of Justice	Christine Negroni, Kreindler & Kreindler	No	No	46 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
138	Letter	8/8/2002	Correspondence re FOIA Request 2002-0195			no	yes	1389 KB	Attorney Work Product Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
139	Wire Transfer	9/19/2002	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212289			No	No	42 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
140	Wire Transfer	9/19/2002	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212290			No	No	46 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
141	Letter	10/2/2002	Motley Rice FOIA request to Dept of Treasury, Disclosure Services, US Customs Services, and IRS	Ronald Motley	Disclosure Services Department of the Treasury; United States Customs Service; Internal Revenue Service; FOIA/PA Section, FBI Department of Justice	No	Yes	158 KB	Attorney Work Product
142	Letter	10/2/2002	Motley Rice FOIA request to FBI	Ronald Motley	Department of Justice	no	no	158 KB	Attorney Work Product
143	Letter	10/2/2002	Motley Rice FOIA request to Dept of Treasury, Disclosure Services, US Customs Services, and IRS	Ronald L. Motley	Disclosure Services Department of the Treasury; US Customs Service; FOIA; IRS Freedom Information Request	no	yes	158 KB	Attorney Work Product Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
144	Wire Transfer	11/1/2002	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212291			No	No	49 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
145	Wire Transfer	11/15/2002	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212292			No	No	42 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.



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146	Wire Transfer	11/15/2002	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212293			No	No	48 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
147	Wire Transfer	12/4/2002	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212294			No	No	51 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
148	Wire Transfer	3/10/2003	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC196288			No	No	49 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
149	Wire Transfer	3/11/2003	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC196289			No	No	54 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
150	Wire Transfer	3/17/2003	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC196290			No	No	46 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
151	Bank Note	4/1/2003	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC008982			No	No	32 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
152	Letter	4/15/2003	Motley Rice FOIA request to US Customs Service	Ronald Motley	United States Customs Service	No	No	163 KB	Attorney Work Product
153	Letter	4/15/2003	Motley Rice FOIA request to Defense Intelligence Agency	Ronald Motley	Defense Intelligence Agency, ISM-1 (FOIA)	No	No	163 KB	Attorney Work Product
154	Letter	4/15/2003	Motley Rice FOIA request to Defense Intelligence Agency	Ronald Motley	Defense Intelligence Agency, ISM-1 (FOIA)	No	No	163 KB	Attorney Work Product
155	Letter	4/15/2003	Motley Rice FOIA request to Defense Intelligence Agency	Ronald Motley	Defense Intelligence Agency, ISM-1 (FOIA)	No	No	163 KB	Attorney Work Product
156	Letter	4/15/2003	Motley Rice FOIA request to Justice Management Department	Ronald Motley	FOIA/PA Mail Referral Unit, Justice Management Division	No	No	163 KB	Attorney Work Product



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157	Letter	4/15/2003	Motley Rice FOIA request to Justice Management Division	Ronald Motley	FOIA/PA Mail Referral Unit, Justice Management Division	No	No	163 KB	Attorney Work Product
158	Letter	4/15/2003	Motley Rice FOIA request to Justice Management Division	Ronald Motley	FOIA/PA Mail Referral Unit, Justice Management Division, Department of Justice	No	No	163 KB	Attorney Work Product
159	Letter	4/15/2003	Motley Rice FOIA request to Drug Enforcement Administration	Ronald Motley	Katherine L. Myrick, Chief, Freedom of Information Operations Unit, Drug Enforcement Administration	No	No	163 KB	Attorney Work Product
160	Letter	4/15/2003	Motley Rice FOIA request to Office of Information Resources Management Programs and Services	Ronald Motley	Margaret P. Grafeld, Information and Privacy Coordinator, Department of State	No	No	163 KB	Attorney Work Product
161	Letter	4/15/2003	Motley Rice FOIA request to Office of Information Resources Management Programs and Services	Ronald Motley	Margaret P. Grafeld, Information and Privacy Coordinator, Department of State	No	No	67 KB	Attorney Work Product
162	Letter	4/15/2003	Motley Rice FOIA request to Dept of State, Office of Information Programs	Ronald Motley	Margaret P. Grafeld, Information and Privacy Coordinator, Department of State	No	No	76 KB	Attorney Work Product
163	Letter	4/15/2003	Dept of State response to Motley Rice FOIA Request	Rene Lindsey	Ronald Motley	No	Yes	151 KB	Attorney Work Product
164	Letter	4/15/2003	Motley Rice FOIA request to Office of Foreign Assets Control (OFAC)	Ronald Motley	United States Department of the Treasury, Office of Foreign Assets Control (OFAC)	No	No	163 KB	Attorney Work Product
165	Letter	4/15/2003	Motley Rice FOIA request to Departmental Offices, Disclosure Services	Ronald Motley	Disclosure Services, Department of the Treasury	No	Yes	221 KB	Attorney Work Product
166	Letter	4/15/2003	Motley Rice FOIA request to US Customs Services	Ronald Motley	United States Customs Service	No	Yes	239 KB	Attorney Work Product
167	Letter	4/15/2003	Motley Rice FOIA request to Disclosure Services	Ronald Motley	Disclosure Services, Department of the Treasury	No	No	163 KB	Attorney Work Product
168	Letter	4/15/2003	Motley Rice FOIA request to Financial Crimes Enforcement Network (FinCEN)	Ronald Motley	U.S. Department of the Treasury, Financial Crimes Enforcement Network (FinCen)	No	No	163 KB	Attorney Work Product

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169	Letter	4/15/2003	Motley Rice FOIA request to Financial Crimes Enforcement Network (FinCEN)	Ronald Motley	U.S. Department of the Treasury, Financial Crimes Enforcement Network (FinCen)	No	No	163 KB	Attorney Work Product
170	Letter	4/15/2003	Motley Rice FOIA request to FBI	Ronald Motley	FOIA/PA Section, FBI Department of Justice	no	no	81 KB	Attorney Work Product
171	Letter	4/15/2003	Motley Rice FOIA request to FBI	Ronald Motley	David Hardy, Chief FOIA Section FBI, Department of Justice	no	no	163 KB	Attorney Work Product
172	Letter	4/15/2003	Motley Rice FOIA request to FBI	Ronald L. Motley	FOIA/PA Section, FBI Department of Justice	no	no	81 KB	Attorney Work Product
173	Letter	4/15/2003	Motley Rice FOIA request to Defense Intelligence Agency	Ronald L. Motley	Department of Justice Agency	no	no	163 KB	Attorney Work Product
174	Letter	4/15/2003	Motley Rice FOIA request to Defense Intelligence Agency	Ronald L. Motley	Defense Intelligence Agency	no	no	163 KB	Attorney Work Product
175	Letter	4/15/2003	Motley Rice FOIA request to Justice Management Department	Ronald L. Motley	FOIA/PA Mail Referral Unit Justice Management Division, Department of Justice	no	no	163 KB	Attorney Work Product
176	Letter	4/15/2003	Motley Rice FOIA request to Justice Management Department	Ronald L. Motley	FOIA/PA Mail Referral Unit Justice Management Division, Department of Justice	no	no	163 KB	Attorney Work Product
177	Letter	4/15/2003	Motley Rice FOIA request to Drug Enforcement Administration	Ronald L. Motley	Katherine L. Myrick, Chief Freedom of Information Operations Unit, Drug Enforcement Administration, Department of Justice	no	no	163 KB	Attorney Work Product
178	Letter	4/15/2003	Motley Rice FOIA request to Justice Management Department	Ronald L. Motley	FOIA/PA Mail Referral Unit Justice Management Division, Department of Justice	no	no	163 KB	Attorney Work Product
179	Letter	4/16/2003	Motley Rice FOIA request to Dept of Treasury, Disclosure Services	Ronald Motley	Unit Justice Management Division, Disclosure Services, Department of the Treasury	No	No	64 KB	Attorney Work Product
180	Letter	4/16/2003	Motley Rice FOIA request to Dept of Treasury, Disclosure Services	Ronald Motley	Disclosure Services, Department of the Treasury	No	No	64 KB	Attorney Work Product
181	Letter	4/16/2003	Motley Rice FOIA request to Financial Crimes Enforcement Network (FinCEN)	Ronald Motley	U.S. Department of the Treasury, Financial Crimes Enforcement Network (FinCen)	No	No	64 KB	Attorney Work Product

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			Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC196291						Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
182	Wire Transfer	4/17/2003			United States Customs Service	No	No	46 KB	
183	Letter	4/18/2003	Motley Rice FOIA request to US Customs Service	Ronald Motley	Marie A. O'Rourke, Assistant Director, FOIA/Privacy Unit, Executive Office for United States Attorneys, Department of Justice	No	No	81 KB	Attorney Work Product
184	Letter	4/18/2003	Motley Rice FOIA request to Executive Office for United States Attorneys	Ronald Motley	Margaret P. Grafeld, Information and Privacy Coordinator, Department of State	No	No	81 KB	Attorney Work Product
185	Letter	4/18/2003	Motley Rice FOIA request to Office of Information Resources Management Programs and Services	Ronald Motley	Disclosure Services, Department of the Treasury	No	No	81 KB	Attorney Work Product
186	Letter	4/18/2003	Motley Rice FOIA request to Dept of Treasury, Disclosure Services	Ronald Motley	Disclosure Services, Department of the Treasury	No	No	84 KB	Attorney Work Product
187	Letter	4/18/2003	Motley Rice FOIA request to Dept of Treasury, Disclosure Services	Ronald Motley	Disclosure Services, Department of the Treasury	No	No	64 KB	Attorney Work Product
188	Letter	4/18/2003	Motley Rice FOIA request to US Embassy-Syria	Ronald L. Motley	Embassy of the United States of America, Abou Rouraneh	no	no	81 KB	Attorney Work Product
189	Letter	4/18/2003	Motley Rice FOIA request to US Customs Services	Ronald L. Motley	US Customs Service	no	no	81 KB	Attorney Work Product
190	Letter	4/18/2003	Motley Rice FOIA request to Dept of Treasury, Disclosure Services	Ronald L. Motley	Freedom of Information Request, Departmental Offices, Disclosure Services, Department of the Treasury	no	no	84 KB	Attorney Work Product
191	Letter	4/18/2003	Motley Rice FOIA request to Executive Office for United States Attorneys	Ronald L. Motley	Marie A. O'Rourke, Assistant Director, FOIA/Privacy Unit, Executive Office for the US Attorneys, Department of Justice	no	no	81 KB	Attorney Work Product
192	Letter	4/23/2003	Motley Rice FOIA request to Motley Rice Defense Intelligence Agency response to Motley Rice FOIA Request	Robert P. Richardson	Ronald Motley	No	No	71 KB	Attorney Work Product

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193	Wire Transfer	4/24/2003	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC191113						Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
194	Letter	4/25/2003	Office of Information Resources Management Programs and Services response to Motley Rice FOIA Request	Rene Lindsey	Ronald Motley	No	Yes	61 KB	Attorney Work Product
195	Wire Transfer	4/29/2003	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC196292			No	No	151 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
196	Letter	4/29/2003	Defense Intelligence Agency response to Motley Rice FOIA Request	Robert P. Richardson	Ronald Motley	No	No	46 KB	Attorney Work Product
197	Letter	4/30/2003	Office of Information Resources Management Programs and Services response to Motley Rice FOIA Request	Richard C. Devine	Ronald Motley	No	Yes	25 KB	Attorney Work Product
198	Letter	4/30/2003	FBI response to Motley Rice FOIA Request	David Hardy	Ronald Motley	no	yes	594 KB	Attorney Work Product
199	Wire Transfer	5/5/2003	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC196293			No	No	1,439 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
200	Wire Transfer	5/7/2003	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC196294			No	No	47 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
201	Wire Transfer	5/12/2003	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC196295			No	No	67 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
202	Wire Transfer	5/14/2003	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC196296			No	No	46 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
203	Letter	5/16/2003	Executive Office for United States Attorneys response to Motley Rice FOIA Request	Marie O'Rourke	Ronald Motley	No	No	46 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
						No	No	50 KB	Attorney Work Product

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204	Wire Transfer	5/20/2003	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC196297			No	No	67 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
205	Letter	5/23/2003	Justice Management Division response to Motley Rice FOIA Request	Benjamin F. Burrell	Ronald Motley	No	Yes	76 KB	Attorney Work Product
206	Wire Transfer	5/27/2003	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC196298			No	No	46 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
207	Wire Transfer	5/28/2003	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC196299			No	No	47 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
208	Facsimile	6/4/2003	Office of Information Resources Management Programs and Services response to Motley Rice FOIA Request	Karen Brothers	Ronald Motley	No	Yes	121 KB	Attorney Work Product
209	Letter	6/9/2003	Dept of Treasury, Disclosure Services response to Motley Rice FOIA Request	Alana Johnson	Ronald Motley	No	No	30 KB	Attorney Work Product
210	Letter	6/11/2003	Justice Management Division response to Motley Rice FOIA Request	Stephen K. Myers	Ronald Motley	No	Yes	87 KB	Attorney Work Product
211	Letter	6/13/2003	US Customs Service response to Motley Rice FOIA Request	Gloria L. Marshall	Ronald Motley	No	No	45 KB	Attorney Work Product
212	Letter	6/19/2003	Motley Rice FOIA request to Office of Information Resources Management Programs and Services	Anne McGinness Kearse	Karen Brothers, U.S. Department of State, Office of IRM Programs and Services	No	Yes	65 KB	Attorney Work Product
213	Letter	6/23/2003	Department of Commerce response to Motley Rice FOIA Request	Brenda Dolan	Ronald Motley	No	No	110 KB	Attorney Work Product
214	Letter	6/30/2003	Motley Rice FOIA request to Dept of Disclosure Services	Anne McGinness Kearse	Alana Johnson, Department of the Treasury	No	No	66 KB	Attorney Work Product
215	Letter	6/30/2003	Motley Rice FOIA request to IRS	Anne McGinness Kearse	Internal Revenue	No	No	70 KB	Attorney Work Product
216	Letter	7/9/2003	Dept of Treasury, Disclosure Services response to Motley Rice FOIA Request	Alana Johnson	Anne McGinness Kearse	No	No	27 KB	Attorney Work Product
217	Letter	7/9/2003	Dept of Treasury response to Motley Rice FOIA Request	Alana Johnson	Ronald Motley	No	No	22 KB	Attorney Work Product
218	Letter	7/14/2003	Dept of Treasury, Disclosure Services response to Motley Rice FOIA Request	Alana Johnson	Ronald Motley	No	No	22 KB	Attorney Work Product
219	Letter	7/22/2003	Motley Rice FOIA request to USAID	Anne McGinness Kearse	Carolyn Carroll, USAID	no	no	42 KB	Attorney Work Product



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220	Attachment	7/30/2003	Attachment to email correspondence with U.S. National Security Agency regarding FOIA request.	J. Scott Tarbuton, Cozen O'Connor.	National Security Agency, FOIA Office.	No	No	470 KB	Attorney Work Product
221	Letter	7/30/2003	Letter correspondence with U.S. Department of Treasury regarding FOIA request.	J. Scott Tarbuton, Cozen O'Connor.	Alana Johnson, Department of Treasury.	No	No	557 KB	Attorney Work Product
222	Letter	7/30/2003	Letter correspondence with U.S. National Security Agency regarding FOIA request.	J. Scott Tarbuton, Cozen O'Connor.	National Security Agency, FOIA Office.	No	No	470 KB	Attorney Work Product
223	Letter	7/30/2003	Letter correspondence with U.S. Department of Justice regarding FOIA request.	J. Scott Tarbuton, Cozen O'Connor.	Department of Justice, FOIA Office.	No	No	367 KB	Attorney Work Product
224	Letter	7/30/2003	Letter correspondence with U.S. Bureau of Alcohol, Tobacco and Firearms regarding FOIA request.	J. Scott Tarbuton, Cozen O'Connor.	Dorothy Chambers, Bureau of Alcohol, Tobacco and Firearms.	No	No	442 KB	Attorney Work Product
225	Letter	7/30/2003	Letter correspondence with U.S. National Security Agency regarding FOIA request.	J. Scott Tarbuton, Cozen O'Connor.	National Security Agency, FOIA Office.	No	No	365 KB	Attorney Work Product
226	Letter	7/30/2003	Letter correspondence with U.S. Department of Treasury regarding FOIA request.	J. Scott Tarbuton, Cozen O'Connor.	Alana Johnson, Department of Treasury.	No	No	447 KB	Attorney Work Product
227	Letter	7/30/2003	Letter correspondence with U.S. Defense Intelligence Agency regarding FOIA request.	J. Scott Tarbuton, Cozen O'Connor.	Defense Intelligence Agency, FOIA Office.	No	No	345 KB	Attorney Work Product
228	Letter	7/30/2003	FOIA Request	Andrew Maloney, Kreindler & Kreindler	Freedom Of Information Section, Executive Office of United States Attorneys, U.S. Department of Justice	no	no	941 KB	Attorney Work Product
229	Letter	8/4/2003	Dept of Justice, Criminal Division response to Motley Rice FOIA Request	Thomas J. McIntyre	Ronald Motley	No	No	53 KB	Attorney Work Product
230	Letter	8/8/2003	Criminal Division response to Motley Rice FOIA Request	Thomas J. McIntyre	Ronald Motley	No	No	33 KB	Attorney Work Product
231	Letter	8/11/2003	Letter correspondence with U.S. Defense Intelligence Agency regarding FOIA request.	Robert P. Richardson, Defense Intelligence Agency.	J. Scott Tarbuton, Cozen O'Connor.	No	No	45 KB	Attorney Work Product
232	Letter	8/12/2003	IRS response to Motley Rice FOIA Request	Symeria R. Rascoe	Anne McGinness Kearse	No	No	43 KB	Attorney Work Product
233	Letter	8/13/2003	Letter correspondence with U.S. Department of Justice regarding FOIA request.	David M. Hardy, Department of Justice.	J. Scott Tarbuton, Cozen O'Connor.	No	No	42 KB	Attorney Work Product
234	Letter	8/13/2003	Letter correspondence with U.S. Bureau of Alcohol, Tobacco and Firearms regarding FOIA request.	Melissa Blevins, Bureau of Alcohol, Tobacco and Firearms.	J. Scott Tarbuton, Cozen O'Connor.	No	No	57 KB	Attorney Work Product
235	Letter	8/14/2003	Letter correspondence with U.S. Defense Security Office regarding FOIA request.	Leslie R. Blake, Defense Security Office.	J. Scott Tarbuton, Cozen O'Connor.	No	No	381 KB	Attorney Work Product
236	Letter	8/26/2003	Letter correspondence with U.S. Department of Treasury regarding FOIA request.	Alana Johnson, Department of Treasury.	J. Scott Tarbuton, Cozen O'Connor.	No	No	79 KB	Attorney Work Product

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Doc Type:	Doc Date:	Title Ref./Description:	Author Name:	Recipients:	Email String:	Attachments:	File Size:	Privilege/Protection:
237 Letter	9/8/2003	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC200301	Muhammad al-Baasiri	Special Investigation Committee, Banque du Liban	No	No	31 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
238 Letter	9/16/2003	Letter correspondence with U.S. Department of Justice regarding FOIA request.	Stephen K. Myers, Department of Justice.	J. Scott Tarbuton, Cozen O'Connor.	No	No	146 KB	Attorney Work Product
239 Letter	9/26/2003	Letter correspondence with U.S. Department of Justice regarding FOIA request.	David M. Hardy, Department of Justice.	J. Scott Tarbuton, Cozen O'Connor.	No	No	19 KB	Attorney Work Product
240 Letter	10/8/2003	Letter correspondence with U.S. Defense Security Office regarding FOIA request.	Leslie R. Blake, Defense Security Office.	J. Scott Tarbuton, Cozen O'Connor.	No	No	88 KB	Attorney Work Product
241 Letter	10/8/2003	IRS response to Motley Rice FOIA Request	Symeria R. Rascoe	Anne McGinness Kearse	No	No	73 KB	Attorney Work Product
242 Letter	10/8/2003	IRS response to Motley Rice FOIA Request	Symeria R. Rascoe	Anne McGinness Kearse	No	No	26 KB	Attorney Work Product
243 Email	10/9/2003	Email correspondence with U.S. Department of Homeland Security regarding FOIA request.	Elizabeth Withnell, Department of Homeland Security.	J. Scott Tarbuton, Cozen O'Connor.	No	No	34 KB	Attorney Work Product
244 Letter	10/9/2003	IRS response to Motley Rice FOIA Request	Symeria R. Rascoe	Anne McGinness Kearse	No	No	26 KB	Attorney Work Product
245 Letter	10/16/2003	Letter correspondence with National Commission on Terrorist Attacks Upon the United States regarding FOIA request.	J. Scott Tarbuton, Cozen O'Connor.	National Commission on Terrorist Attacks Upon the United States.	No	No	49 KB	Attorney Work Product
246 Letter	10/17/2003	Letter correspondence with U.S. Bureau of Alcohol, Tobacco and Firearms regarding FOIA request.	J. Scott Tarbuton, Cozen O'Connor.	Dorothy Chambers, Bureau of Alcohol, Tobacco and Firearms.	No	No	36 KB	Attorney Work Product
247 Letter	10/17/2003	Letter correspondence with U.S. Department of Treasury regarding FOIA request.	J. Scott Tarbuton, Cozen O'Connor.	Department of Treasury, FOIA Office.	No	No	32 KB	Attorney Work Product
248 Letter	10/17/2003	Letter correspondence with U.S. Defense Intelligence Agency regarding FOIA request.	J. Scott Tarbuton, Cozen O'Connor.	Defense Intelligence Agency, FOIA Office.	No	No	34 KB	Attorney Work Product
249 Letter	10/17/2003	Office of Information Resources Management Programs and Services response to Motley Rice FOIA Request	Margaret P. Grafeld	Ronald Motley	No	Yes	13,976 KB	Attorney Work Product
250 Letter	10/24/2003	Dept of Treasury response to Motley Rice FOIA Request	Alana Johnson	Anne McGinness Kearse	No	No	21 KB	Attorney Work Product
251 Email	10/27/2003	Email correspondence with U.S. Department of Treasury regarding FOIA request.	Cawana Pearson, Department of Treasury.	J. Scott Tarbuton, Cozen O'Connor.	No	No	25 KB	Attorney Work Product
252 Letter	10/29/2003	Letter correspondence with U.S. Department of Justice regarding FOIA request.	Launie Ann Day, Department of Justice.	J. Scott Tarbuton, Cozen O'Connor.	No	No	62 KB	Attorney Work Product
253 Letter	10/29/2003	Dept of Treasury, Disclosure Services response to Motley Rice FOIA Request	Alana Johnson	Anne McGinness Kearse	No	No	23 KB	Attorney Work Product

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	Doc Type:	Doc Date:	Title Ref./Description:	Author Name:	Recipients:	Email String:	Attachments:	File Size:	Privilege/Protection:
254	Letter	10/31/2003	Motley Rice FOIA request to the Bureau of Engraving and Printing	Ronald Motley	Patricia Warden, Bureau of Engraving and Printing- FOIA Office	No	No	771 KB	Attorney Work Product
255	Letter	10/31/2003	Motley Rice FOIA request to Dept of Justice, Justice Management Division	Ronald Motley	Unit, Justice Management Division, Department of Justice	No	No	79 KB	Attorney Work Product
256	Letter	10/31/2003	Motley Rice FOIA request to Office of Information Resources Management Programs and Services	Ronald Motley	Margaret P. Grafeld, Information and Privacy Coordinator, Department of State	No	No	771 KB	Attorney Work Product
257	Letter	10/31/2003	Motley Rice FOIA request to Dept of Treasury Alcohol and Tobacco Tax and Trade Bureau	Ronald Motley	Dorothy Chambers, U.S. Department of the Treasury, Alcohol and Tobacco Tax and Trade Bureau	No	No	769 KB	Attorney Work Product
258	Letter	10/31/2003	Motley Rice FOIA request to Comptroller of the Currency	Ronald Motley	Comptroller of the Currency Disclosure (FOIA) Office	No	No	769 KB	Attorney Work Product
259	Letter	10/31/2003	Motley Rice FOIA request to Dept of Treasury, Departmental Offices	Ronald Motley	Alana Johnson, Department of the Treasury	No	No	771 KB	Attorney Work Product
260	Letter	10/31/2003	Motley Rice FOIA request to Dept of Treasury, Financial Management Services	Ronald Motley	Robert Spiegel, U.S. Department of the Treasury, Financial Management Service, Disclosure Branch	No	No	777 KB	Attorney Work Product
261	Letter	10/31/2003	Motley Rice FOIA request to Inspector General for the Tax Administration	Ronald Motley	Melissa Stuart, U.S. Department of the Treasury, Office of the Inspector General for Tax Information	No	No	771 KB	Attorney Work Product
262	Letter	10/31/2003	Motley Rice FOIA request to Dept of Treasury, Bureau of the Public Debt	Ronald Motley	Denise Hofmann, U.S. Department of the Treasury, Bureau of the Public Debt	No	No	773 KB	Attorney Work Product
263	Letter	10/31/2003	Motley Rice FOIA request to Dept of Treasury, Office of Third Supervision	Ronald Motley	Dirk Roberts, U.S. Department of the Treasury, Office of Thrift Supervision	No	No	777 KB	Attorney Work Product



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	Doc Type:	Doc Date:	Title Ref./Description:	Author Name:	Recipients:	Email String:	Attachments:	File Size:	Privilege/Protection:
					Gregory Smith, U.S. Department of the Treasury, Financial Crimes Enforcement Network (FinCen)	No	No	771 KB	Attorney Work Product
264	Letter	10/31/2003	Motley Rice FOIA request to Financial Crimes Enforcement Network (FinCen)	Ronald Motley	Patricia Warden, Bureau of Engraving and Printing	no	no	771 KB	Attorney Work Product
265	Letter	10/31/2003	Motley Rice FOIA request to Bureau of Engraving and Printing	Ronald L. Motley	Margaret Graefeld, Information & Privacy Coordinator, Office of Information Resources Management Programs and Services	no	no	771 KB	Attorney Work Product
266	Letter	10/31/2003	Motley Rice FOIA request to Dept of State, Office of Information Resources Management Programs and Services	Ronald L. Motley	Robert Spiegel, US Department of the Treasury Financial Management Service, Disclosure Branch	no	no	771 KB	Attorney Work Product
267	Letter	10/31/2003	Motley Rice FOIA request to Dept of Treasury, Financial Management Services	Ronald L. Motley	Melissa Stuart, US Department of the Treasury Office of the Inspector General for Tax Administration	no	no	771 KB	Attorney Work Product
268	Letter	10/31/2003	Motley Rice FOIA request to Inspector General for the Tax Administration	Ronald L. Motley	Gregory Smith, US Department of the Treasury (FinCen)	no	no	771 KB	Attorney Work Product
269	Letter	10/31/2003	Motley Rice FOIA request to Dept of Treasury, FinCen	Ronald L. Motley	Dorothy Chambers, US Department of the Treasury Alcohol and Tobacco Tax and Trade Bureau	no	no	769 KB	Attorney Work Product
270	Letter	10/31/2003	Motley Rice FOIA request to Dept of Treasury Alcohol and Tobacco Tax and Trade Bureau	Ronald L. Motley	Frank Vance, Comptroller of the Currency Disclosure (FOIA) Office	no	no	769 KB	Attorney Work Product
271	Letter	10/31/2003	Motley Rice FOIA request to Comptroller of the Currency	Ronald L. Motley	Dirk Roberts, US Department of the Treasury, Office of Thrift Supervision	no	no	777 KB	Attorney Work Product
272	Letter	10/31/2003	Motley Rice FOIA request to Dept of Treasury, Office of Third Supervision	Ronald L. Motley		no	no	25 KB	Attorney Work Product
273	Letter	11/6/2003	Dept of Treasury, Bureau of the Public Debt response to Motley Rice FOIA Request	Denise K. Hofmann	Ronald Motley	No	No		

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274	Letter	11/12/2003	Office of Information Resources Management Programs and Services response to Motley Rice FOIA Request	Rene Lindsey	Ronald Motley	No	No	200 KB	Attorney Work Product
275	Letter	11/17/2003	Dept of Treasury, Financial Management Services response to Motley Rice FOIA Request	Tom Longnecker	Ronald Motley	No	No	26 KB	Attorney Work Product
276	Letter	11/18/2003	Letter correspondence with National Commission on Terrorist Attacks Upon the United States regarding FOIA request.	Daniel Marcus, National Commission on Terrorist Attacks Upon the United States.	J. Scott Tarbutton, Cozen O'Connor.	No	No	36 KB	Attorney Work Product
277	Letter	11/18/2003	Bureau of Engraving and Printing response to Motley Rice FOIA Request	Patricia Warden	Ronald Motley	No	No	30 KB	Attorney Work Product
278	Letter	11/18/2003	Dept of Treasury, Disclosure Services response to Motley Rice FOIA Request	Alana Johnson	Ronald Motley	No	No	30 KB	Attorney Work Product
279	Letter	11/18/2003	Dept of Treasury, Disclosure Services response to Motley Rice FOIA Request	Alana Johnson	Ronald Motley	No	No	28 KB	Attorney Work Product
280	Wire Transfer	11/21/2003	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC212784			No	No	30 KB	Produced pursuant to Protective Order dated August 1, 2005, in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases.
281	Letter	11/21/2003	Dept of Treasury, FinCEN response to Motley Rice FOIA Request	Gregory A. Smith	Ronald Motley	No	Yes	592 KB	Attorney Work Product
282	Letter	11/25/2003	Dept of Treasury, Disclosure Services Office response to Motley Rice FOIA Request	Melissa D. Stuart	Ronald Motley	No	Yes	96 KB	Attorney Work Product
283	Letter	11/25/2003	Motley Rice FOIA request to FBI	Michael E. Elsner	FBI, Attn: Freedom of Information-Privacy Act Unit, Records Resources Division	no	no	114 KB	Attorney Work Product
284	Letter	12/3/2003	Motley Rice FOIA request to Office of Information Resources Management Programs and Services	Michael Elsner	Margaret P. Grafeld, Information and Privacy Coordinator, Department of State	No	No	29 KB	Attorney Work Product
285	Letter	12/3/2003	Motley Rice FOIA request to US Dept of Treasury, Departmental Offices	Michael Elsner	Alana Johnson, Department of the Treasury	No	No	29 KB	Attorney Work Product
286	Letter	12/3/2003	FAA response to Motley Rice FOIA Request	Michael E. Elsner	Alana Johnson, FOIA Request Department of Treasury	no	no	44 KB	Attorney Work Product
287	Letter	12/3/2003	Motley Rice FOIA request to FBI	Michael E. Elsner	David Hardy, Chief FOIA Officer, FBI, Department of Justice	no	no	29 KB	Attorney Work Product
288	Letter	12/3/2003	Motley Rice FOIA request to Central Intelligence Agency	Michael E. Elsner	Information and Privacy Coordinator, CIA	no	no	29 KB	Attorney Work Product

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289	Letter	12/3/2003	Motley Rice FOIA request to FBI	Michael E. Elsner	David M. Hardy, Chief FOIA Section, FBI	no	no	29 KB	Attorney Work Product
290	Letter	12/3/2003	Motley Rice FOIA request to Dept of Treasury, Bureau of Immigration and Customs response to	Michael E. Elsner	Alana Johnson, FOIA Request Department of Treasury	no	no	29 KB	Attorney Work Product
291	Letter	12/8/2003	Motley Rice FOIA Request	Gloria L. Marshall	Ronald Motley	No	No	112 KB	Attorney Work Product
292	Letter	12/10/2003	Letter correspondence with U.S. Department of Justice regarding FOIA request.	Laurie Ann Day, Department of Justice.	J. Scott Tarbutton, Cozen O'Connor.	No	No	48 KB	Attorney Work Product
293	Letter	1/6/2004	Motley Rice FOIA request to Office of Information Resources Management Programs and Services	Michael Elsner	Margaret P. Graefeld, Information and Privacy Coordinator, Department of State	No	No	31 KB	Attorney Work Product
294	Letter	1/6/2004	Motley Rice FOIA request to Departmental Offices	Michael Elsner	Alana Johnson, Department of the Treasury	No	No	31 KB	Attorney Work Product
295	Letter	1/6/2004	Motley Rice FOIA request to National Security Council	Michael E. Elsner	National Security Council, Freedom of Information Act	no	no	32 KB	Attorney Work Product
296	Letter	1/8/2004	FBI response to Motley Rice FOIA Request	David Hardy	Requests, Executive Office of the President	no	no	96 KB	Attorney Work Product
297	Letter	1/21/2004	Office of Information Resources Management Programs and Services response to Motley Rice FOIA Request	Rene Lindsey	Michael Elsner	no	no	333 KB	Attorney Work Product
298	Letter	1/22/2004	Dept of Justice, Justice Management Division response to Motley Rice FOIA Request	Stuart Frisch	Ronald Motley	No	No	70 KB	Attorney Work Product
299	Letter	1/27/2004	Alcohol and Tobacco Tax and Trade Bureau to Alana Johnson, Departmental Offices response to Motley Rice FOIA Request	William H. Foster	Alana Johnson, Department of the Treasury	No	No	21 KB	Attorney Work Product
300	Letter	2/4/2004	Letter correspondence with U.S. Department of Homeland Security regarding FOIA request.	J. Scott Tarbutton, Cozen O'Connor.	Elizabeth Withnell, Department of Homeland Security.	No	No	29 KB	Attorney Work Product
301	Letter	2/4/2004	Letter correspondence with U.S. Bureau of Alcohol, Tobacco and Firearms regarding FOIA request.	J. Scott Tarbutton, Cozen O'Connor.	Dorothy Chambers, Bureau of Alcohol, Tobacco and Firearms.	No	No	33 KB	Attorney Work Product
302	Letter	2/4/2004	Letter correspondence with U.S. Department of Treasury regarding FOIA request.	J. Scott Tarbutton, Cozen O'Connor.	Department of Treasury, FOIA Office.	No	No	32 KB	Attorney Work Product
303	Letter	2/4/2004	Letter correspondence with U.S. Defense Intelligence Agency regarding FOIA request.	J. Scott Tarbutton, Cozen O'Connor.	Defense Intelligence Agency, FOIA Office.	No	No	30 KB	Attorney Work Product
304	Letter	2/17/2004	Letter correspondence with U.S. Department of Treasury regarding FOIA request	Alana Johnson, Department of Treasury.	J. Scott Tarbutton, Cozen O'Connor.	No	No	17 KB	Attorney Work Product

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305	Letter	2/17/2004	Motley Rice FOIA request to Justice Management Division	Michael Elsner	FOIA/PA Mail Referral Unit, Justice Management Division, Department of Justice David M. Hardy, Chief Record/Information Dissemination Section, Records Management Division, FBI,	No	No	114 KB	Attorney Work Product
306	Letter	2/17/2004	Motley Rice FOIA request to FBI	Michael E. Elsner	Department of Justice FOIA/PA Mail Referral Unit, Justice Management Division	no	no	114 KB	Attorney Work Product
307	Letter	2/17/2004	Motley Rice FOIA request to Dept of Justice Management Division	Michael E. Elsner	Department of Justice	no	no	114 KB	Attorney Work Product
308	Statement	2/29/2004	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC008888			No	No	36 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
309	Account Statement	2/29/2004	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC008066			No	No	34 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
310	Wire Transfer	3/1/2004	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC195816			No	No	63 KB	Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
311	Letter	3/18/2004	Correspondence re FOIA Request 03-2560	Marie A. O'Rourke, Executive Office US Attorneys, Freedom of Information Unit,	Andrew Maloney, Kreindler & Kreindler	no	yes	566 KB	Attorney Work Product
312	Letter	3/19/2004	Letter correspondence with U.S. Department of Justice regarding FOIA request.	Melissa Blevins, Department of Justice.	J. Scott Tarbuton, Cozen O'Connor.	No	No	58 KB	Attorney Work Product
313	Letter	3/26/2004	Dept of Justice, Criminal Division response to Motley Rice FOIA Request	Thomas J. McIntyre	Ronald Motley	No	No	33 KB	Attorney Work Product
314	Letter	3/29/2004	FOIA Request	Andrew Maloney, Kreindler & Kreindler	Marie A. O'Rourke, Executive Office US Attorneys, Freedom of Information Unit, Department of Justice	no	yes	514 KB	Attorney Work Product

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315	Letter	3/31/2004	Dept of Treasury, Disclosure Services response to Motley Rice FOIA Request	Gregory A. Smith	Ronald Motley Federal Aviation Administration, National Freedom of Information Act Staff	No	No	97 KB	Attorney Work Product
316	Letter	3/31/2004	Motley Rice FOIA request to FAA	Michael E. Elsner	Executive Office of Immigration Review	no	no	22 KB	Attorney Work Product
317	Letter	4/5/2004	Motley Rice FOIA request to Office of General Council	Michael Elsner	Eileen Donovan, Assistant Secretary for FOIA Matters, Commodity Futures Trading Commission	No	No	37 KB	Attorney Work Product
318	Letter	4/12/2004	Motley Rice FOIA request to Commodity Futures Trading Commission	Michael Elsner	Eileen Donovan, Assistant Secretary for FOIA Matters, Commodity Futures Trading Commission	No	No	23 KB	Attorney Work Product
319	Letter	4/12/2004	Motley Rice FOIA request to Commodity Futures Trading Commission	Michael E. Elsner	Assistant Secretary for FOIA Matters, Commodity Futures Trading Commission	no	no	23 KB	Attorney Work Product
320	Letter	4/14/2004	Motley Rice FOIA request to CIA	Michael Elsner	Coordinator, Central Intelligence Agency Margaret P. Grafeld, Information and Privacy Coordinator, Department of State	No	No	23 KB	Attorney Work Product
321	Letter	4/14/2004	Motley Rice FOIA request to Office of Information Services	Michael Elsner	Information and Privacy Coordinator, Central Intelligence Agency	No	No	21 KB	Attorney Work Product
322	Letter	4/27/2004	Motley Rice FOIA request to CIA	Michael Elsner	Information and Privacy Coordinator, Central Intelligence Agency	No	No	22 KB	Attorney Work Product
323	Letter	4/27/2004	Motley Rice FOIA request to Office of Information Programs	Michael Elsner	Margaret P. Grafeld, Information and Privacy Coordinator, Department of State	No	No	22 KB	Attorney Work Product
324	Letter	4/27/2004	Motley Rice FOIA request to National Security Council	Michael E. Elsner	Rob Soubers, Director Access Management Dorothy S. Turner, FOIA/PA Specialist, INTERPOL, United States National Central Bureau, Department of Justice	no	no	23 KB	Attorney Work Product
325	Letter	5/6/2004	Motley Rice FOIA request to National Central Bureau	Michael Elsner		No	No	23 KB	Attorney Work Product



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326	Letter	5/6/2004	Motley Rice FOIA request to Office of Information Resources Management Programs and Services	Michael Elsner	Margaret P. Grafield, Information and Privacy Coordinator, Department of State	No	No	22 KB	Attorney Work Product
327	Letter	5/6/2004	Motley Rice FOIA request to FBI	Michael E. Elsner	David M. Hardy, Chief Record/Information Dissemination Section, Records Management Division, FBI, Department of Justice	no	no	22 KB	Attorney Work Product
328	Letter	5/13/2004	CIA response to Motley Rice FOIA Request	Alan W. Tate	Michael Elsner	No	Yes	562 KB	Attorney Work Product
329	Letter	5/13/2004	Office of Information Programs response to Motley Rice FOIA Request	Jerry Allsbrook, Jr.	Michael Elsner	No	No	73 KB	Attorney Work Product
330	Letter	5/13/2004	Motley Rice FOIA request to Office of Information Resources Management Programs and Services	Michael Elsner	Margaret P. Grafield, Information and Privacy Coordinator, Department of State	No	No	22 KB	Attorney Work Product
331	Letter	5/13/2004	Motley Rice FOIA request to FAA	Michael Elsner	Federal Aviation Administration, National Freedom of Information Act Staff	No	No	22 KB	Attorney Work Product
332	Letter	5/27/2004	Letter correspondence with U.S. Department of Justice regarding FOIA request.	J. Scott Tarbutton, Cozen O'Connor.	Laurie Ann Day, Department of Justice.	No	No	25 KB	Attorney Work Product
333	Letter	5/27/2004	Letter correspondence with U.S. Department of Homeland Security regarding FOIA request.	J. Scott Tarbutton, Cozen O'Connor.	Elizabeth Withnell, Department of Homeland Security.	No	No	114 KB	Attorney Work Product
334	Letter	5/27/2004	Letter correspondence with U.S. Department of Justice regarding FOIA request.	J. Scott Tarbutton, Cozen O'Connor.	Melissa Blevins, Department of Justice.	No	No	167 KB	Attorney Work Product
335	Letter	5/27/2004	Letter correspondence with U.S. Department of Treasury regarding FOIA request.	J. Scott Tarbutton, Cozen O'Connor.	Alana Johnson, Department of Treasury.	No	No	116 KB	Attorney Work Product
336	Letter	5/27/2004	Letter correspondence with U.S. Defense Intelligence Agency regarding FOIA request.	J. Scott Tarbutton, Cozen O'Connor.	Robert P. Richardson, Defense Intelligence Agency.	No	No	142 KB	Attorney Work Product
337	Wire Transfer	5/27/2004	Arab Bank internal document produced in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC195817				No	61 KB	Produced pursuant to Protective Order dated August 1, 2005, in Linde, et al. v. Arab Bank, PLC, Case No. 04-CV-2799(NG)(VVP) and related cases.
338	Letter	6/2/2004	Motley Rice FOIA request to Jimmy Carter Presidential Library	Michael Elsner	James A. Yancey, Jr., Jimmy Carter Library	No	No	22 KB	Attorney Work Product
339	Letter	6/7/2004	National Central Bureau response to Motley Rice FOIA Request	Kevin R. Smith	Michael Elsner	No	No	41 KB	Attorney Work Product

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340	Letter	6/8/2004	Letter correspondence with U.S. Department of Treasury regarding FOIA request.	Alana Johnson, Department of Treasury.	J. Scott Tarbutton, Cozen O'Connor.	No	No	18 KB	Attorney Work Product
341	Letter	6/9/2004	Letter correspondence with U.S. Defense Intelligence Agency regarding FOIA request.	Robert P. Richardson, Defense Intelligence Agency.	J. Scott Tarbutton, Cozen O'Connor.	No	No	60 KB	Attorney Work Product
342	Letter	6/11/2004	Motley Rice FOIA request to the 9/11 Commission	Michael Elsner	National Commission on Terrorist Attacks Upon the United States	No	No	22 KB	Attorney Work Product
343	Letter	6/11/2004	Motley Rice FOIA request to President George H.W. Bush Library	Michael Elsner	Warren Finch, President George H.W. Bush Library	No	No	199 KB	Attorney Work Product
344	Letter	6/11/2004	Motley Rice FOIA request to Jimmy Carter Presidential Library	Michael Elsner	James A. Yancey, Jr., Jimmy Carter Library	No	No	42 KB	Attorney Work Product
345	Letter	6/11/2004	Motley Rice FOIA request to Jimmy Carter Presidential Library	Michael Elsner	James A. Yancey, Jr., Jimmy Carter Library	No	No	23 KB	Attorney Work Product
346	Letter	6/11/2004	Motley Rice FOIA request to the White House	Michael E. Elsner	The White House, FOIA Officer	no	yes	199 KB	Attorney Work Product
347	Letter	6/11/2004	Motley Rice FOIA request to White House	Michael E. Elsner	The White House, FOIA Officer	no	yes	199 KB	Attorney Work Product
348	Letter	6/11/2004	Motley Rice FOIA request to President George H.W. Bush Library	Michael E. Elsner	Warren Finch, President George H.W. Bush Library	no	no	199 KB	Attorney Work Product
349	Letter	6/11/2004	Motley Rice FOIA request to Jimmy Carter Presidential Library	Michael E. Elsner	James A. Yancey, Jr., Jimmy Carter Library	no	no	23 KB	Attorney Work Product
350	Letter	6/11/2004	Motley Rice FOIA request to Jimmy Carter Presidential Library	Michael E. Elsner	James A. Yancey, Jr., Jimmy Carter Library	no	no	42 KB	Attorney Work Product
351	Letter	6/14/2004	Motley Rice FOIA request to US Dept of Justice	Michael Elsner	Patricia D. Harris, Management Analyst, FOIA/PA Mail Referral Unit, Department of Justice	No	Yes	87 KB	Attorney Work Product
352	Letter	6/21/2004	FAA, NW Region response to Motley Rice FOIA Request	Karl B. Lewis	Michael Elsner	No	Yes	463 KB	Attorney Work Product
353	Letter	6/22/2004	Motley Rice FOIA request to FBI	Michael E. Elsner	David M. Hardy, Chief Record/Information Dissemination Section, Records Management Division, FBI,	no	no	22 KB	Attorney Work Product
354	Letter	6/23/2004	Letter correspondence with U.S. Department of Justice regarding FOIA request.	Marilyn R. LaBrie, Department of Justice.	J. Scott Tarbutton, Cozen O'Connor.	No	No	101 KB	Attorney Work Product
355	Letter	6/26/2004	FAA response to Motley Rice FOIA Request	Joann Noonan	Michael Elsner	No	No	40 KB	Attorney Work Product



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					Katherine L. Myrick, Chief, Freedom of Information Operations Unit, Drug Enforcement Administration	No	No	22 KB	Attorney Work Product
356	Letter	6/28/2004	Motley Rice FOIA request to DEA	Michael Elsner	Margaret P. Grafeld, Information and Privacy Coordinator, Department of State	No	No	22 KB	Attorney Work Product
357	Letter	6/28/2004	Motley Rice FOIA request to Office of Information Resources Management Programs and Services	Michael Elsner	David M. Hardy, Chief Record/Information Dissemination Section, Records Management Division, FBI, Department of Justice	No	No	22 KB	Attorney Work Product
358	Letter	6/28/2004	Motley Rice FOIA request to FBI Office of Information Resources Management Programs and Services response to Motley Rice FOIA Request	Michael E. Elsner	Ronald Motley	no	no	22 KB	Attorney Work Product
359	Letter	6/29/2004	US Dept. of State response to Motley Rice FOIA Request	Margaret P. Grafeld	Michael Elsner	No	Yes	11,234 KB	Attorney Work Product
360	Letter	7/8/2004	Motley Rice FOIA request to FBI	Richard C. Devine	Michael Elsner	No	Yes	97 KB	Attorney Work Product
361	Letter	7/8/2004	Justice Management Division response to Motley Rice FOIA Request	David Hardy	Michael Elsner	no	yes	118 KB	Attorney Work Product
362	Letter	7/13/2004	Justice Management Division response to Motley Rice FOIA Request	Thomas J. McIntyre	Michael Elsner	No	No	43 KB	Attorney Work Product
363	Letter	7/14/2004	Justice Management Division response to Motley Rice FOIA Request	Ronald L. Deacon	Michael Elsner	No	Yes	66 KB	Attorney Work Product
364	Letter	7/15/2004	Letter correspondence with U.S. Department of Treasury regarding FOIA request.	J. Scott Tarbutton, Cozen O'Connor.	Alana Johnson, Department of Treasury.	No	No	49 KB	Attorney Work Product
365	Email	7/16/2004	FAA response to Motley Rice FOIA Request	Joann Noonan	Michael Elsner Sherrie Fletcher, President Ronald Reagan Library	yes	no	2 KB	Attorney Work Product
366	Letter	7/23/2004	Motley Rice FOIA request to President Ronald Reagan Library	Michael E. Elsner	Michael Elsner	no	no	37 KB	Attorney Work Product
367	Letter	7/26/2004	FAA response to Motley Rice FOIA Request	Joann Noonan	Michael Elsner	no	no	40 KB	Attorney Work Product
368	Letter	7/26/2004	FAA response to Motley Rice FOIA Request	Joann Noonan	Michael Elsner	no	no	40 KB	Attorney Work Product
369	Letter	8/9/2004	FAA response to Motley Rice FOIA Request	Joseph Tintera	Michael Elsner	no	yes	73 KB	Attorney Work Product
370	Letter	8/10/2004	Motley Rice FOIA request to DEA	Michael Elsner	Katherine L. Myrick, Chief, Freedom of Information Operations Unit, Drug Enforcement Administration	No	No	22 KB	Attorney Work Product
371	Letter	8/10/2004	Motley Rice FOIA request to FAA	Michael E. Elsner	Federal Aviation Administration, National Freedom of Information Act Staff	no	no	22 KB	Attorney Work Product

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	Doc Type:	Doc Date:	Title Ref./Description:	Author Name:	Recipients:	Email String:	Attachments:	File Size:	Privilege/Protection:
372	Letter	8/10/2004	Motley Rice FOIA request to FBI	Michael E. Elsner	David M. Hardy, Chief FOIA Section, FBI Department of Justice	no	no	22 KB	Attorney Work Product
373	Letter	8/12/2004	FOIA Request	John Fawcett, Kreindler & Kreindler	Margaret P. Grafeld, Office of Information Programs and Services, U.S. Department of State,	no	no	26 KB	Attorney Work Product
374	Letter	8/13/2004	FAA response to Motley Rice FOIA Request	Joann Noonan	Michael Elsner	no	no	27 KB	Attorney Work Product
375	Letter	8/13/2004	FAA response to Motley Rice FOIA Request	Joann Noonan	Michael Elsner	no	no	30 KB	Attorney Work Product
376	Letter	8/20/2004	Letter correspondence with U.S. Department of Justice regarding FOIA request.	J. Scott Tarbutton, Cozen O'Connor,	Department of Justice, FOIA Office,	No	No	234 KB	Attorney Work Product
377	fax	8/24/2004	Correspondence Re FOIA Request 200403264	John Fawcett, Kreindler & Kreindler	Margaret P. Grafeld, Office of Information Programs and Services, U.S. Department of State,	no	yes	2134 KB	Attorney Work Product
378	Letter	8/27/2004	Criminal Division response to Motley Rice FOIA Request	Thomas J. McIntyre Margaret P. Grafeld, Office of Information Programs and Services, U.S. Department of State	Michael Elsner	No	No	41 KB	Attorney Work Product
379	Letter	8/27/2004	Correspondence Re FOIA Request 200403264		John Fawcett, Kreindler & Kreindler Federal Aviation Administration, National Freedom of Information Act Staff	no	no	57 KB	Attorney Work Product
380	Letter	8/28/2004	Motley Rice FOIA request to FAA	Michael E. Elsner		no	no	22 KB	Attorney Work Product
381	Letter	8/30/2004	Dept of Treasury response to Motley Rice FOIA Request	Merete M. Evans	Ronald Motley	No	No	25 KB	Attorney Work Product
382	Letter	9/1/2004	President George H.W. Bush Library response to Motley Rice FOIA Request	Michael Elsner	Warren Finch, President George H.W. Bush Library	No	No	504 KB	Attorney Work Product
383	Letter	9/8/2004	FAA SW Region response to Motley Rice FOIA Request	Ava Wilkerson	Michael Elsner	no	yes	4,071 KB	Attorney Work Product
384	Letter	9/8/2004	FAA response to Motley Rice FOIA Request	Ava Wilkerson	Michael Elsner Associate Administrator for Regions and Center Operation, ARC-1, Federal Aviation Administration	no	yes	4,080 KB	Attorney Work Product
385	Letter	9/11/2004	Motley Rice FOIA request to FAA	Michael E. Elsner		no	no	545 KB	Attorney Work Product

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	Doc Type:	Doc Date:	Title Ref./Description:	Author Name:	Recipients:	Email String:	Attachments:	File Size:	Privilege/Protection:
386	Letter	9/13/2004	Re: MDL 1570	Andrew Maloney, Kreindler & Kreindler	Sarah Normand, Executive Office US Attorneys, U.S.	no	yes	112 KB	Attorney Work Product
387	Letter	9/14/2004	FAA response to Motley Rice FOIA Request	Tracy Paquin	Michael Elsner	no	no	24 KB	Attorney Work Product
388	Letter	9/22/2004	Motley Rice FOIA request to FBI	Mary Schiavo	David M. Hardy, Chief FOIA Section, FBI	no	no	27 KB	Attorney Work Product
389	Letter	9/22/2004	Motley Rice FOIA request to FBI	Mary Schiavo	FBI Laboratory	no	no	27 KB	Attorney Work Product
390	Letter	9/24/2004	Motley Rice FOIA request to President Ronald Reagan Library	Michael E. Elsner	Sherrie Fletcher, President Ronald Reagan Library	no	no	25 KB	Attorney Work Product
391	Letter	9/27/2004	Letter correspondence with U.S. Department of Justice regarding FOIA request.	Priscilla Jones, Department of Justice.	J. Scott Tarbuton, Cozen O'Connor, Katherine L. Myrick, Chief, Freedom of Information Operations Unit, Drug Enforcement Administration	No	No	53 KB	Attorney Work Product
392	Letter	9/30/2004	Motley Rice FOIA request to DEA	Michael Elsner	David M. Hardy, Chief FOIA Section, FBI	no	no	21 KB	Attorney Work Product
393	Letter	9/30/2004	Motley Rice FOIA request to FBI	Michael E. Elsner	Department of Justice	no	no	22 KB	Attorney Work Product
394	Letter	10/5/2004	Office of Information Resources Management Programs and Services response to Motley Rice FOIA Request	Margaret P. Grafeld	Ronald Motley	No	Yes	494 KB	Attorney Work Product
395	Letter	10/29/2004	TSA response to Motley Rice FOIA Request	Catrina Pavlik	Michael Elsner	No	Yes	555 KB	Attorney Work Product
396	Letter	11/5/2004	FOIA Request	John Fawcett, Kreindler & Kreindler	FOIA Office, U.S. Department of Justice	no	no	25 KB	Attorney Work Product
397	Letter	11/8/2004	President Ronald Reagan Library response to Motley Rice FOIA Request	Shelly Jacobs	Michael Elsner	no	no	90 KB	Attorney Work Product
398	Letter	11/15/2004	Motley Rice FOIA request to Office of Information Programs	Michael Elsner	Karen Brothers, U.S. Department of State, Office of IRM Programs and Services	No	Yes	75 KB	Attorney Work Product
399	Letter	11/24/2004	US Dept of State, Office of Information Resources Management Programs and Services response to Motley Rice FOIA Request	Margaret P. Grafeld	Ronald Motley	No	Yes	2,585 KB	Attorney Work Product
400	Letter	12/28/2004	FBI response to Motley Rice FOIA Request	David Hardy	Michael Elsner	no	yes	99 KB	Attorney Work Product
401	Letter	1/5/2005	Dept of the Navy response to Motley Rice FOIA Request	Jason Jones	Ronald Motley	no	yes	510 KB	Attorney Work Product
402	Letter	1/17/2005	Letter correspondence with U.S. Department of Treasury regarding FOIA request.	J. Scott Tarbuton, Cozen O'Connor.	Alana Johnson, Department of Treasury.	No	No	2317 KB	Attorney Work Product

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Doc Type:	Doc Date:	Title Ref./Description:	Author Name:	Recipients:	Email String:	Attachments:	File Size:	Privilege/Protection:
403 Letter	1/25/2005	Letter correspondence with U.S. Department of Treasury regarding FOIA request.	Alana Johnson, Department of Treasury.	J. Scott Tarbuton, Cozen O'Connor, Karen Brothers, U.S. Department of State, Office of IRM Programs and Services	No	No	78 KB	Attorney Work Product
404 Letter	2/10/2005	Motley Rice FOIA request to Office of Information Programs and Services	Michael Elsner United States Attorney Southern District of New York	Andrew Maloney, Kreindler & Kreindler	No	No	34 KB	Attorney Work Product
405 Letter	2/10/2005	Re: In re Terrorist Attacks Litigation of Septemebr 11, 2001	York	Andrew Maloney, Kreindler & Kreindler	no	no	31 KB	Attorney Work Product
406 Letter	2/16/2005	Letter correspondence with U.S. Department of Treasury regarding FOIA request.	J. Scott Tarbuton, Cozen O'Connor.	Alana Johnson, Department of Treasury.	No	No	1024 KB	Attorney Work Product Produced pursuant to Protective Order dated August 1, 2005, in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases.
407 List	3/27/2005	Arab Bank internal document produced in <i>Linde, et al. v. Arab Bank, PLC</i> , Case No. 04-CV-2799(NG)(VVP) and related cases with bates number ABPLC002292 - ABPLC002326			No	No	2734 KB	
408 Letter	5/10/2005	Office of Information Programs response to Motley Rice FOIA Request	Margaret P. Grafeld J. Scott Tarbuton, Cozen O'Connor.	Ronald Motley Alana Johnson, Department of Treasury.	No	Yes	3,367 KB	Attorney Work Product
409 Letter	5/16/2005	Letter correspondence with U.S. Department of Treasury regarding FOIA request.	Marie A. O'Rourke, Executive Office US Attorneys, Freedom of Information Unit, Department of Justice		No	No	1067 KB	Attorney Work Product
410 Letter	5/18/2005	Correspondence re FOIA Request 03-2560		Andrew Maloney, Kreindler & Kreindler	no	yes	603 KB	Attorney Work Product
411 Letter	5/23/2005	Letter correspondence with U.S. Department of Treasury regarding FOIA request.	J. Scott Tarbuton, Cozen O'Connor.	Alana Johnson, Department of Treasury.	No	No	871 KB	Attorney Work Product
412 Letter	5/24/2005	Dept of Treasury, Departmental Offices response to Motley Rice FOIA Request			No	No	20 KB	Attorney Work Product
413 Letter	5/25/2005	Motley Rice FOIA request to Justice Management Division	Alana Johnson	Ronald Motley FOIA/PA Mail Referral Unit, Justice Management Division, Department of Justice	No	No	33 KB	Attorney Work Product
414 Letter	5/25/2005	Motley Rice FOIA request to Dept of Transportation	Benjamin Davis	Kathy Ray, Department of Transportation	No	No	33 KB	Attorney Work Product
415 Letter	5/25/2005	Motley Rice FOIA request to Justice Management Division	Benjamin Davis	FOIA/PA Mail Referral Unit, Justice Management Division	No	No		
416 Letter	6/22/2005	FAA response to Motley Rice FOIA Request	Benjamin Davis John Barrett	Department of Justice Michael Elsner	no	no	33 KB	Attorney Work Product
417 Letter	7/5/2005	Re: In re Terrorist Attacks Litigation of Septemebr 11, 2001	United States Attorney Southern District of New York	Andrew Maloney, Kreindler & Kreindler	no	no	108 KB	Attorney Work Product

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	Doc Type:	Doc Date:	Title Ref./Description:	Author Name:	Recipients:	Email String:	Attachments:	File Size:	Privilege/Protection:
418	Letter	7/18/2005	FBI response to Motley Rice FOIA Request	William A. Miller	Michael Hall	No	Yes	146 KB	Attorney Work Product
419	Letter	7/18/2005	Dept of Justice Office of Information and Privacy response to Motley Rice FOIA Request	Richard L. Huff	Michael Elsner	No	No	38 KB	Attorney Work Product
420	Letter	7/18/2005	FBI response to Motley Rice FOIA Request	William A. Miller	Michael Hall	No	Yes	146 KB	Attorney Work Product
421	Letter	8/19/2005	CIA response to Motley Rice FOIA Request	Scott Koch	Ronald Motley	No	Yes	79 KB	Attorney Work Product
422	Letter	9/9/2005	US Dept of State, Office of Information Resources Management Programs and Services response to Motley Rice FOIA Request	Margaret P. Grafeld	Michael Elsner	No	Yes	176 KB	Attorney Work Product
423	Letter	9/30/2005	Dept of Treasury, FinCEN response to Motley Rice FOIA Request	Gregory A. Smith Margaret P. Grafeld, Office of Information Programs and Services, U.S. Department of State	Ronald Motley	No	No	34 KB	Attorney Work Product
424	Letter	11/17/2005	Correspondence Re FOIA Request 200403264		John Fawcett, Kreindler & Kreindler Law Enforcement, Department of the Treasury, Disclosure Services	no	no	1002 KB	Attorney Work Product
425	Letter	11/22/2005	Motley Rice FOIA request to Dept of Transportation	Michael Elsner		No	No	160 KB	Attorney Work Product
426	Letter	11/28/2005	FBI response to Motley Rice FOIA Request	David M. Hardy	Michael Elsner	No	Yes	93 KB	Attorney Work Product
427	Letter	11/28/2005	FBI response to Motley Rice FOIA Request	David M. Hardy	Michael Elsner	No	Yes	1,789 KB	Attorney Work Product
428	Letter	12/2/2005	Letter correspondence with U.S. Central Intelligence Agency regarding FOIA request.	J. Scott Tarbutton, Cozen O'Connor.	Central Intelligence Agency, FOIA Office.	No	No	129 KB	Attorney Work Product
429	Letter	12/5/2005	Dept of Justice, Justice Management Division response to Motley Rice FOIA Request	Ronald Deacon	Michael Elsner	no	yes	76 KB	Attorney Work Product
430	Letter	12/16/2005	Dept of Treasury Disclosure Services response to Motley Rice FOIA Request	Alana Johnson	Michael Elsner	No	No	61 KB	Attorney Work Product
431	Letter	12/16/2005	Defense Intelligence Agency response to Motley Rice FOIA Request	Margaret Bestrain	Michael Elsner	no	yes	184 KB	Attorney Work Product
432	Letter	2/7/2006	Dept of Justice Office of Information and Privacy response to Motley Rice FOIA Request	Priscilla Jones	Michael Elsner	No	No	32 KB	Attorney Work Product
433	Letter	2/13/2006	Motley Rice FOIA request to Office of Information Programs and Services		Office of Information Programs and Services, AJRPS/IPS/RL, U.S. Department of State	No	No	767 KB	Attorney Work Product
434	Letter	2/14/2006	Motley Rice FOIA request to Dept of Treasury, Disclosure Services	Michael Elsner	Law Enforcement, Department of the Treasury, Disclosure Services	No	No	68 KB	Attorney Work Product
435	Letter	2/16/2006	Letter correspondence with U.S. Department of Treasury regarding FOIA request.	J. Scott Tarbutton, Cozen O'Connor.	Alana Johnson, Department of Treasury.	No	No	41 KB	Attorney Work Product
436	Letter	2/16/2006	Letter correspondence with U.S. Department of Treasury regarding FOIA request.	J. Scott Tarbutton, Cozen O'Connor.	Department of Treasury, FOIA Office.	No	No	293 KB	Attorney Work Product



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	Doc Type:	Doc Date:	Title Ref./Description:	Author Name:	Recipients:	Email String:	Attachments:	File Size:	Privilege/Protection:
437	Letter	2/17/2006	Letter correspondence with U.S. Defense Intelligence Agency regarding FOIA request.	J. Scott Tarbutton, Cozen O'Connor.	Brian S. Kinsey, Defense Intelligence Agency.	No	No	168 KB	Attorney Work Product
438	Letter	3/22/2006	Letter correspondence with U.S. Defense Intelligence Agency regarding FOIA request.	Margaret A. Bestrain, Defense Intelligence Agency.	J. Scott Tarbutton, Cozen O'Connor.	No	No	33 KB	Attorney Work Product
439	Letter	4/6/2006	Motley Rice FOIA request to Office of Information Resources Management Programs and Services	Margaret P. Grafeld	Michael Elsner	No	Yes	2,618 KB	Attorney Work Product
440	Letter	4/12/2006	Letter correspondence with U.S. Defense Intelligence Agency regarding FOIA request.	Margaret A. Bestrain, Defense Intelligence Agency.	J. Scott Tarbutton, Cozen O'Connor.	No	No	55 KB	Attorney Work Product
441	Letter	4/20/2006	Office of Information Program response to Motley Rice FOIA Request	Margaret P. Grafeld	Michael Elsner	No	Yes	2,909 KB	Attorney Work Product
442	Letter	5/10/2006	FinCEN Disclosure Offices response to Motley Rice FOIA Request	Gregory A. Smith	Michael Elsner	No	No	44 KB	Attorney Work Product
443	Letter	5/11/2006	USAID response to Motley Rice FOIA Request	Carolyn a. Carroll	Anne McGinness Kearse	no	yes	89 KB	Attorney Work Product
444	Letter	5/23/2006	Motley Rice FOIA request to Dept of Treasury, Disclosure Services	Michael Elsner	Law Enforcement, Department of the Treasury, Disclosure Services	No	Yes	242 KB	Attorney Work Product
445	Letter	5/26/2006	Federal Reserve System response to Motley Rice FOIA Request	Margaret McCloskey Shanks	Michael Elsner	no	yes	96 KB	Attorney Work Product
446	Letter	6/2/2006	Dept of Treasury, Disclosure Services response to Motley Rice FOIA Request	Dale Underwood	Anne McGinness Kearse	No	Yes	103 KB	Attorney Work Product
447	Letter	6/2/2006	Dept of Treasury, Disclosure Services response to Motley Rice FOIA Request	Dale Underwood	Ronald Motley	No	Yes	176 KB	Attorney Work Product
448	Letter	6/2/2006	Dept of Treasury, Disclosure Services response to Motley Rice FOIA Request	Dale Underwood	Anne McGinness Kearse	No	No	34 KB	Attorney Work Product
449	Fax	6/5/2006	FOIA Request	FAA Aircraft Registry	John Fawcett, Kreindler & Kreindler	no	no	416 KB	Attorney Work Product
450	Letter	6/8/2006	US Dept of Treasury, Disclosure Services response to Motley Rice FOIA Request	Hugh Gilmore	Michael Elsner	No	No	68 KB	Attorney Work Product
451	Letter	6/21/2006	Bureau of Diplomatic Security response to Motley Rice FOIA Request	Joe Morton	Michael Elsner	No	Yes	275 KB	Attorney Work Product
452	Letter	6/27/2006	Letter correspondence with U.S. Defense Intelligence Agency regarding FOIA request.	J. Scott Tarbutton, Cozen O'Connor.	Margaret A. Bestrain, Defense Intelligence Agency.	No	No	198 KB	Attorney Work Product
453	Letter	6/29/2006	Dept of Treasury, Disclosure Services response to Motley Rice FOIA Request	Michael Elsner	Dale Underwood, Department of the Treasury, Disclosure Services	No	Yes	68 KB	Attorney Work Product
454	Letter	7/19/2006	TSA response to Motley Rice FOIA Request	Scott Koch	Michael Elsner	No	Yes	81 KB	Attorney Work Product

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	Doc Type:	Doc Date:	Title Ref./Description:	Author Name:	Recipients:	Email String:	Attachments:	File Size:	Privilege/Protection:
455	Letter	8/24/2006	Motley Rice FOIA request to Dept of Treasury Disclosure Services	Michael Elsner	Alana Johnson, Department of the Treasury	No	No	135 KB	Attorney Work Product
456	Letter	8/29/2006	USAID response to Motley Rice FOIA Request US Dept of State, Office of Information Resources Management Programs and Services response to Motley Rice FOIA Request	J.M. Paskar	Anne McGinness Kearse	no	no	254 KB	Attorney Work Product
457	Letter	9/1/2006	Dept of Treasury Disclosure Services response to Motley Rice FOIA Request	Charlene Wright Thomas	Michael Elsner	No	No	57 KB	Attorney Work Product
458	Letter	9/1/2006	Motley Rice FOIA request to the White House	Dale Underwood	Michael Elsner Keith Roberts, Chief FOIA Officer, White House	No	No	54 KB	Attorney Work Product
459	Letter	9/25/2006	Motley Rice FOIA request to the White House	Michael E. Elsner	Keith Roberts, Chief FOIA Officer, White House	no	yes	70 KB	Attorney Work Product
460	Letter	9/25/2006	Motley Rice FOIA request to White House	Michael E. Elsner	Keith Roberts, Chief FOIA Officer, White House	no	yes	70 KB	Attorney Work Product
461	Letter	9/26/2006	FOIA Request	John Fawcett, Kreindler & Kreindler	U.S. Department of the Treasury FOIA Office	no	no	22 KB	Attorney Work Product
462	Letter	9/27/2006	FAA response to Motley Rice FOIA Request	Douglas Murphy	Michael Elsner	no	no	132 KB	Attorney Work Product
463	Letter	10/4/2006	Motley Rice FOIA request to Office of Information Resources Management Programs and Services	Michael Elsner	U.S. Department of State, Office of Information Programs and Services	No	No	66 KB	Attorney Work Product
464	Letter	10/16/2006	US Immigration and Customs Enforcement response to Motley Rice FOIA Request	Gloria Marshall	Michael Elsner	no	yes	132 KB	Attorney Work Product
465	Letter	10/16/2006	Correspondence Re FOIA Request 2006-10-03	Hugh Gilmore, Disclosure Services, U.S. Department of the Treasury	John Fawcett, Kreindler & Kreindler	no	no	429 KB	Attorney Work Product
466	Letter	11/20/2006	Motley Rice FOIA request to Dept of Homeland Security	Michael E. Elsner	Privacy Office, Department of Homeland Security	no	yes	339 KB	Attorney Work Product
467	Letter	12/5/2006	Dept of State, Office of Information Programs and Services response to Motley Rice FOIA Request	Erica Perel	Michael Elsner	no	no	94 KB	Attorney Work Product
468	Letter	12/5/2006	Dept of Homeland Security, Office of the General Counsel response to Motley Rice FOIA Request	Erica Perel	Michael Elsner	no	no	27 KB	Attorney Work Product
469	Letter	12/15/2006	FinCEN Disclosure Offices response to Motley Rice FOIA Request	Gregory A. Smith	Michael Elsner	No	No	109 KB	Attorney Work Product
470	Letter	1/18/2007	Office of Information Programs and Services response to Motley Rice FOIA Request	Margaret P. Grafeld	Michael Elsner	No	Yes	177 KB	Attorney Work Product
471	Email	1/25/2007	Email correspondence with U.S. Department of Defense regarding FOIA request.	J. Scott Tarbutton, Cozen O'Connor.	Department of Defense, FOIA Office.	No	Yes (see ID # 472)	1 KB	Attorney Work Product



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	Doc Type:	Doc Date:	Title Ref./Description:	Author Name:	Recipients:	Email String:	Attachments:	File Size:	Privilege/Protection:
472	Attachment	1/25/2007	Attachment to email correspondence with U.S. Department of Defense regarding FOIA request.	J. Scott Tarbuton, Cozen O'Connor.	Department of Defense, FOIA Office.	No	No	103 KB	Attorney Work Product
473	Letter	1/25/2007	Letter correspondence with U.S. Department of Treasury regarding FOIA request.	J. Scott Tarbuton, Cozen O'Connor.	Department of Defense, FOIA Office.	No	No	103 KB	Attorney Work Product
474	Letter	1/31/2007	Office of Information Program and Services response to Motley Rice FOIA Request	Margaret P. Grafeld	Michael Elsner	No	Yes	508 KB	Attorney Work Product
475	Letter	2/1/2007	US Dept of State, Office of Information Programs and Services response to Motley Rice FOIA Request	Margaret Grafeld	Anne McGinness Kearse	no	yes	596 KB	Attorney Work Product
476	Email	3/15/2007	Email correspondence with U.S. Department of Defense regarding FOIA request.	J. Scott Tarbuton, Cozen O'Connor.	Department of Defense, FOIA Office.	No	Yes (see ID # 477)	1 KB	Attorney Work Product
477	Attachment	3/15/2007	Attachment to email correspondence with U.S. Department of Defense regarding FOIA request.	J. Scott Tarbuton, Cozen O'Connor.	Department of Defense, FOIA Office.	No	No	117 KB	Attorney Work Product
478	Letter	3/15/2007	Letter correspondence with U.S. Department of Defense regarding FOIA request.	J. Scott Tarbuton, Cozen O'Connor.	Department of Defense, FOIA Office.	No	No	117 KB	Attorney Work Product
479	Email	3/16/2007	Email correspondence with U.S. Department of Defense regarding FOIA request.	J. Scott Tarbuton, Cozen O'Connor.	Department of Defense, FOIA Office.	No	Yes (see ID # 480)	1 KB	Attorney Work Product
480	Attachment	3/16/2007	Attachment to email correspondence with U.S. Department of Defense regarding FOIA request.	J. Scott Tarbuton, Cozen O'Connor.	Department of Defense, FOIA Office.	No	No	152 KB	Attorney Work Product
481	Letter	3/16/2007	Letter correspondence with U.S. Department of Defense regarding FOIA request.	J. Scott Tarbuton, Cozen O'Connor.	Department of Defense, FOIA Office.	No	No	172 KB	Attorney Work Product
482	Letter	4/23/2007	Letter correspondence with U.S. Department of Defense regarding FOIA request.	Will Kammerer, Department of Defense.	J. Scott Tarbuton, Cozen O'Connor.	No	No	49 KB	Attorney Work Product
483	Letter	5/17/2007	Motley Rice FOIA request to FinCEN	Michael Elsner	Gregory Smith, Financial Crimes Enforcement Network, Disclosure Office	No	No	88 KB	Attorney Work Product
484	Letter	5/17/2007	Motley Rice FOIA request to Dept of Treasury, FinCEN	Michael Elsner	Gregory Smith, Financial Crimes Enforcement Network, Disclosure Office	No	No	91 KB	Attorney Work Product
485	Letter	6/22/2007	Dept of Treasury Financial Crimes Enforcement Network response to Motley Rice FOIA Request	Gregory A. Smith	Ronald Motley	No	Yes	7,316 KB	Attorney Work Product
486	Letter	8/24/2007	Correspondence Re FOIA Request	John Fawcett, Kreindler & Kreindler	FOIA Unit, Federal Bureau of Investigation, U.S. Department of Justice	no	no	1398 KB	Attorney Work Product
487	Fax	8/28/2007	FOIA Request	John Fawcett, Kreindler & Kreindler	U.S. Securities and Exchange Commission	no	yes	1656 KB	Attorney Work Product
488	Fax	8/31/2007	FOIA Request	John Fawcett, Kreindler & Kreindler	Scott Koch, Information and Privacy Coordinator, Central Intelligence Agency	no	yes	2332 KB	Attorney Work Product

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	Doc Type:	Doc Date:	Title Ref./Description:	Author Name:	Recipients:	Email String:	Attachments:	File Size:	Privilege/Protection:
				David M. Hardy, Records Management Division, Federal Bureau of Investigation, U.S. Department of Justice	John Fawcett, Kreindler & Kreindler	no	yes	1020 KB	Attorney Work Product
489	Letter	8/31/2007	Correspondence Re FOIA Request	Dale Underwood, Disclosure Services, U.S. Department of the Treasury	John Fawcett, Kreindler & Kreindler	no	no	517 KB	Attorney Work Product
490	Letter	9/14/2007	Correspondence Re FOIA Request 2007-09-17	Everene Johnson, FOIA/Privacy Act Officer, U.S. Securities and Exchange Commission	John Fawcett, Kreindler & Kreindler	no	no	876 KB	Attorney Work Product
491	Letter	9/17/2007	Correspondence Re FOIA Request 07-08345	Brookly McLaughlin, Deputy Asst Secretary, Office of Public Affairs, U.S. Department of the Treasury	Christine Negroni, Kreindler & Kreindler	no	no	398 KB	Attorney Work Product
492	Letter	9/17/2007	Correspondence Re FOIA Request 2005-01-014	John Fawcett, Kreindler & Kreindler	U.S. Federal Aviation Administration FOIA Coordinator	no	no	13 KB	Attorney Work Product
493	Email	9/18/2007	Correspondence Re FOIA Request 2007-7730	Joann Noonan, FOIA Specialist, Federal Aviation Authority, U.S. Department of Transportation	John Fawcett, Kreindler & Kreindler	no	no	117 KB	Attorney Work Product
494	Letter	9/19/2007	Correspondence Re FOIA Request 2007-7730	J. Scott Tarbutton, Cozen O'Connor	Margaret A. Bestrain, Defense Intelligence Agency	no	no	100 KB	Attorney Work Product
495	Letter	9/21/2007	Letter correspondence with U.S. Defense Intelligence Agency regarding FOIA request.	Janice Galli McLeod, Department of Justice	J. Scott Tarbutton, Cozen O'Connor	no	no	31 KB	Attorney Work Product
496	Letter	9/25/2007	Letter correspondence with U.S. Department of Justice regarding FOIA request.	Gloria L. Marshall, Information Disclosure Unit, Immigration and Customs Enforcement, Department of Homeland Security	Christine Negroni, Kreindler & Kreindler	no	no	443 KB	Attorney Work Product
497	Letter	9/26/2007	Correspondence re FOIA 04-FOIA-15887	Wilma Manning, Department of State	J. Scott Tarbutton, Cozen O'Connor	no	no	38 KB	Attorney Work Product
498	Fax	9/27/2007	Letter correspondence with U.S. Department of State regarding FOIA request.	Wilma Manning, Patrick D. Scholl, Department of State	J. Scott Tarbutton, Cozen O'Connor	no	no	22 KB	Attorney Work Product
499	Email	9/27/2007	Email correspondence with U.S. Department of State regarding FOIA request.			no	no		

**03-MDL-1570 Plaintiffs' Executive Committees'  
Privilege Log**

Doc Type:	Doc Date:	Title Ref./Description:	Author Name:	Recipients:	Email String:	Attachments:	File Size:	Privilege/Protection:
500 Fax	9/27/2007	FOIA Request	John Fawcett, Kreindler & Kreindler	FOIA/PA Request, Disclosure Services, U.S. Department of the Treasury	no	yes	2192 KB	Attorney Work Product
501 Email	9/28/2007	Email correspondence with U.S. Department of Defense regarding FOIA request.	J. Scott Tarbuton, Cozen O'Connor.	Department of Defense, Wilma Manning.	Yes	No	5 KB	Attorney Work Product
502 Email	9/28/2007	Email correspondence with U.S. Department of State regarding FOIA request.	J. Scott Tarbuton, Cozen O'Connor.	Department of State, J. Scott Tarbuton, Cozen O'Connor.	Yes	No	24 KB	Attorney Work Product
503 Email	9/28/2007	Email correspondence with U.S. Department of Defense regarding FOIA request.	Aaron Graves, Department of Defense, Scott Koch, Information and Privacy Coordinator, Central Intelligence Agency	J. Scott Tarbuton, Cozen O'Connor.	Yes	No	8 KB	Attorney Work Product
504 Letter	10/1/2007	Correspondence re FOIA Req F-2007-1961	John Fawcett, Kreindler & Kreindler	John Fawcett, Kreindler & Kreindler	no	no	999 KB	Attorney Work Product
505 Letter	10/2/2007	Letter correspondence with U.S. Department of Justice regarding FOIA request.	J. Scott Tarbuton, Cozen O'Connor.	Janice Galli McLeod, Department of Justice.	No	No	76 KB	Attorney Work Product
506 Email	10/4/2007	Correspondence Re FOIA Request 2007-7730	Michael A. Cirillo, Systems Operations Services, Federal Aviation Authority, U.S. Department of Transportation	John Fawcett, Kreindler & Kreindler	no	yes	811 KB	Attorney Work Product
507 Email	10/8/2007	Email correspondence with U.S. Department of Defense regarding FOIA request.	J. Scott Tarbuton, Cozen O'Connor.	Aaron Graves, Department of Defense.	No	No	3 KB	Attorney Work Product
508 Email	10/9/2007	Email correspondence with U.S. Department of Defense regarding FOIA request.	J. Scott Tarbuton, Cozen O'Connor.	Aaron Graves, Department of Defense.	Yes	No	9 KB	Attorney Work Product
509 Email	10/9/2007	Email correspondence with U.S. Department of Defense regarding FOIA request.	Aaron Graves, Department of Defense.	J. Scott Tarbuton, Cozen O'Connor.	Yes	No	10 KB	Attorney Work Product
510 Email	10/25/2007	Email correspondence with U.S. Department of State regarding FOIA request.	Wilma Manning, Department of State.	J. Scott Tarbuton, Cozen O'Connor.	Yes	No	7 KB	Attorney Work Product
511 Email	10/26/2007	Letter correspondence with U.S. Federal Bureau of Investigation regarding FOIA request.	J. Scott Tarbuton, Cozen O'Connor.	Wilma Manning, Department of State.	Yes	No	7 KB	Attorney Work Product
512 Letter	10/29/2007	Dept of Treasury, Disclosure Services response to Motley Rice FOIA Request	Loren Shaver, Federal Bureau of Investigation.	J. Scott Tarbuton, Cozen O'Connor.	No	No	139 KB	Attorney Work Product
513 Letter	10/29/2007	FinCEN Disclosure Offices response to Motley Rice FOIA Request	Amanda Michanczyk	Michael Elsner	No	Yes	80 KB	Attorney Work Product
514 Letter	11/5/2007	Dept of Treasury response to Motley Rice FOIA Request	William F. Batty	Michael Elsner	No	No	34 KB	Attorney Work Product
515 Letter	11/6/2007	Dept of Treasury response to Motley Rice FOIA Request	Amanda Michanczyk	Michael Elsner	No	No	95 KB	Attorney Work Product